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Committee on Safeguards

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**NOTIFICATION UNDER ARTICLE 12.1(B) OF THE AGREEMENT ON
SAFEGUARDS ON FINDING A SERIOUS INJURY OR THREAT
THEREOF CAUSED BY INCREASED IMPORTS****NOTIFICATION OF A PROPOSAL TO IMPOSE A MEASURE**

INDONESIA

Cotton Fabric

The following communication, dated and received on 12 September 2025, is being circulated at the request of the delegation of Indonesia.

Pursuant to Articles 12.1(b) of the Agreement on Safeguards, the Government of the Republic of Indonesia submits a notification on finding serious injury or threat thereof, to the domestic industries producing "Cotton Fabric" and a notification of proposed safeguard measures. This notification contains all pertinent information relating to the proposed safeguard measures in accordance with Article 12.2 of the Agreement on Safeguards and an offer of consultations pursuant to Article 12.3 of the Agreement on Safeguards.

A. GENERAL BACKGROUND**1. Initiation of Investigation**

On 18 September 2023, an application for a safeguard measure was received by the Investigating Authority from the Indonesian Textiles Association (API) hereinafter referred as "the Applicant", against the importation of the product under investigation. After examining the properly documented application, the Investigating Authority concluded that there was sufficient evidence to justify the initiation of a safeguard investigation.

Subsequently, on 27 October 2023, the Investigating Authority initiated a safeguard investigation on the import of "Cotton Fabric". The commencement of the investigation was announced in the *Bisnis Indonesia* newspaper and the Ministry of Trade's website on the same day of the initiation. The said initiation was also notified in the WTO document [G/SG/N/6/IDN/40](#), circulated on 1 November 2023.

2. Period of Investigation

The initial period of investigation covers 2020 to 2022 and then updated to 2021-2024 during the investigation.

3. Major Proportion

The total production of the Applicant is 55,2% of the total domestic production of the Subject Goods in 2024. Therefore, it represents a major proportion as required by Article 4.1(c) of the WTO Agreement on Safeguards.

4. Views and Comments of the Interested Parties

In accordance with Article 3.1 of the WTO Agreement on Safeguards, during the process of investigation, the Investigating Authority has provided opportunities to all interested parties, to submit their views, evidence, comments, and responses concerning the investigation. In light of the aforementioned, the Investigating Authority has held public hearings on 29 November 2023. (The invitation to the public hearing was notified in the WTO document [G/SG/N/6/IDN/40](#), circulated on 1 November 2023). Furthermore on 16 July 2025, the investigating authority notified to the WTO in regard the additional HS of the subject good and also provide opportunity for the interested party to convey views and comments through notification of Article 12.1 supplement ([G/SG/N/6/IDN/40/Suppl.1](#)).

B. INFORMATION ON WHETHER THERE IS AN ABSOLUTE INCREASE IN IMPORTS OR AN INCREASE IN IMPORTS RELATIVE TO DOMESTIC PRODUCTION

In the light to provide evidence whether there is an absolute increase in imports or an increase in imports relative to domestic production, the Investigating Authority has analysed import data of the Subject Goods during the period of investigation.

1. Absolute Increase in Imports

Table 1. Volume of Imports

Description	Unit	Year			
		2021	2022	2023	2024
Volume of Imports	Ton	16,963	20,909	20,580	20,637
Growth	%		23.26	(1.58)	0.28
Trend	%	5.89			

Source: Indonesian Statistics / *Badan Pusat Statistik* (BPS), Proceed.

During the period of 2021-2024, import volumes demonstrated an overall upward trend by 5.89%. In absolute terms, imports rose significantly from 16,963 tons in 2021 to 20,909 tons in 2022, marking a 23.26% increase. This was followed by a temporary decline in 2023, with import volumes decreasing to 20,580 tons or a decrease of 1.58%. However, the trend reversed in 2024, as import volumes increased once more to 20,637 tons, reflecting a 0.28% rise.

2. Relative Increase in Imports to Total Domestic Production

Table 2. Volume of Imports, National Production, and Relative to Total Domestic Production

Description	Unit	Year			
		2021	2022	2023	2024
Volume of Imports	Ton	16,963	20,909	20,580	20,637
National Production	Index	100	87.98	76.19	69.39
Imports Relative to the Domestic Production	Index	100	140.10	159.22	175.31
Growth	%		40.10	13.65	10.10
Trend	%	19.87			

Source: BPS and as verified by Investigating Authority.

As seen in Table above, there was a surge increased in imports relative to the national production during the investigation period, from 100 indexed points in 2021 to 140.10 indexed points in 2022, increase again to 159.22 indexed points in 2023 and continue increase to 175.31 indexed points in 2024. During 2021-2024, imports relative to the national production was increased with trend of 19.87%.

3. Imports from Main Countries

Table 3. Import Shares

Country	2024	
	Volume (Ton)	Share of imports (%)
People's Republic of China (PRC)	17,006	82.40
Viet Nam	1,039	5.04
India	999	4.84
Hong Kong, China	638	3.09
Other countries	955	4.63
World	20,637	100

Source: BPS, Proceed.

From the table above, the biggest shares of import in 2024 was PRC, which its shares of import in 2024 accounted for 82.40%. Other countries with share of imports above 3% during 2024 are Viet Nam (5.04%), India (4.84%), Hong Kong, China (3.09%) and other countries members with the share of 4.63%.

4. Unforeseen Development

The surge in import volumes of the Investigated Goods from exporting countries caused by numerous unforeseen developments such as the US–China trade war, the increase in production of Woven Fabrics of Cotton in India, and the unexpected expansion of textile production capacity in Viet Nam.

a. Circumvention of PRC Exports due to the United States' Import Ban Policy

On 21 June 2022, the United States issued a policy to prohibit imports from the PRC, especially from Xinjiang Province (the PRC's largest producer of cotton and its derivatives) if the products are made by Uyghur workers in Xinjiang, China. The regulation is regulated in Section 2 of Public Law No. 117-78, An Act to ensure that goods made with forced labor in the Xinjiang Uyghur Autonomous Region of the People's Republic of China do not enter the United States, and for other purposes (the Uyghur Forced Labor Prevention Act). With the enactment of this regulation, imports of Cotton Fabric products from the PRC in the United States have decreased drastically until 2024, proving that the PRC has shifted its Cotton Fabric export destination from United States to other countries, one of which is Indonesia. This then unexpectedly caused a spike in imports of Cotton Fabric from the PRC in Indonesia.

b. India's Raw Cotton Export Restrictions Driving Increase in Indian Cotton Fabric Productions and Exports

In 2022, the Indian textile industry faced a sharp spike in domestic cotton prices, which almost doubled compared to the previous year. This price hike prompted industry players to request the government to impose a ban on raw cotton exports to ensure domestic raw material availability and stabilize prices. The surge in domestic cotton prices led to calls from the textile industry to the Indian government to impose a ban on raw cotton exports. The aim was to ensure adequate supply to domestic producers and stabilize sharply rising prices. While there was no formal export ban imposed by the Indian government, discussions on raw cotton export restrictions and high cotton prices prompted Indian manufacturers to focus more on domestic cotton derivatives production. This was aimed at increasing value addition through Cotton Fabric and other cotton derivatives, thereby reducing dependence on raw material exports and increasing the competitiveness of Indian Cotton Fabric products in the global market. This situation led to an increase in Indian Cotton Fabric exports worldwide, which in turn led to an unexpected surge in Indian Cotton Fabric exports to Indonesia.

c. Unexpected Expansion of Textile Production Capacity in Viet Nam

Viet Nam has traditionally been recognized as a textile production hub operating under the Cut-Make-Trim (CMT) or order-based production model. In 2023, however, Viet Nam's textile industry underwent an unforeseen shift towards Original Design Manufacturing (ODM) and Original Brand Manufacturing (OBM). This strategic transformation resulted in a substantial enhancement of

production capacity, technological capability, and human resources within Viet Nam's textile sector. Consequently, these developments have led to a significant surge in exports of Woven Cotton Fabrics from Viet Nam to global markets, including Indonesia.

C. EVIDENCE OF SERIOUS INJURY OR THREAT THEREOF CAUSED BY INCREASED IMPORTS

To determine the existence of serious injury or threat of serious injury that is caused by increased imports, the Investigating Authority has analyzed and made an evaluation of all relevant factors in an objective and quantifiable nature. The following analyses are based on data provided by the Applicant, which has been verified by the Investigating Authority.

1. Evidence of Serious Injury or Threat of Serious Injury

The macroeconomic indicators related to Subject Goods in the safeguard investigation are presented at the table below:

Table 4. National Consumption, Volume of Imports, and Market Shares

No.	Description	Unit	Year				Trend (21-24)
			2021	2022	2023	2024	
1.	National Consumption	Index	100	97.67	88.73	81.09	(6.99)
2.	Applicant's market share	Index	100	93.40	91.42	88.76	(3.72)
3.	Non-Applicant's market share	Index	100	97.00	94.91	92.49	(2.53)
4.	Import's market share	Index	100	126.21	136.73	150.02	13.85

Source: BPS, API, and as verified by the Investigating Authority.

Based on the table above, it can be concluded that during the investigation period the surge in market share of imports has taken the national's market share (market share of both Applicant and non-Applicant).

From 2021 to 2024 national consumption has decreased with a trend of 6.99%. On the contrary, import's market share increased with a trend of 13.85% in the same period. The increase in the import's market share resulted in a decline of both Applicant's and non-Applicant's market share with a trend of 3.72% and 2.53%.

Table 5. The Applicant's Indicators of Injury

No.	Description	Unit	Year				Trend (21-24)
			2021	2022	2023	2024	
1.	Production	Index	100	93.09	81.98	72.86	(10.21)
2.	Domestic Sales	Index	100	91.22	81.11	71.97	(10.45)
3.	Productivity	Index	100	102.44	92.48	90.81	(3.84)
4.	Utilization Capacity	Index	100	93.00	81.74	72.65	(10.31)
5.	Financial Losses	Index	(100)	(49.50)	(18.60)	(7.58)	(58.17)
6.	Employment	Index	100	90.88	88.65	80.24	(6.62)

Source: As verified by the Investigating Authority.

As shown in Table 5, the performance of the Applicant can be seen as follows:

- Production experienced a decrease with a trend of 10.21% during 2021-2024, from 100 indexed points in 2021 to 93.09 indexed points in 2022, then decreased to 81.98 indexed points in 2023 and continuously decreased to 72.86 indexed points in 2024.
- Domestic Sales experienced a decrease with a trend of 10.45% during 2021-2024, from 100 indexed points in 2021 to 91.22 indexed points in 2022, then decreased to 81.11 indexed points in 2023 and continuously decreased to 71.97 indexed points in 2024.
- Productivity experienced a decrease with a trend of 3.84% during 2021-2024, from 100 indexed points in 2021 to 102.44 indexed points in 2022, then decreased to 92.48 indexed points in 2023 and continuously decreased to 90.81 indexed points in 2024.

- d. Utilization Capacity experienced a decrease with a trend of 10.31% during 2021-2024, from 100 indexed points in 2021 to 93.00 indexed points in 2022, then decreased to 81.74 indexed points in 2023 and continuously decreased to 72.65 indexed points in 2024.
- e. Applicant's financial losses experienced a decrease with a trend of 58.17% during 2021-2024, from (100) indexed points in 2021 to (49.50) indexed points in 2022, then decreased to (18.60) indexed points in 2023 and (7.58) indexed points in 2024. The decrease in the Applicant's financial losses is attributable to cost-efficiency measures, including layoffs and reduced procurement of raw materials, which were undertaken as a result of the suspension of production lines caused by declining sales due to imports. This indicates that the improvement in financial performance did not stem from market recovery, but from contraction of operations.
- f. The Employment experienced a decrease with a trend of 6.62% during 2021-2024, from 100 indexed points in 2021 to 90.88 indexed points in 2022, then decreased to 88.65 indexed points in 2023 and continuously decreased to 80.24 indexed points in 2024.
- g. Based on the explanation above, it can be concluded that during the investigation period, the Applicant experienced a serious injury based on the Applicant's performance that indicated a downward trend in production, domestic sales, productivity, utilization capacity, employment, and keep facing financial losses.

2. Other Factors That May Contribute to Injury

To ensure that the serious injury is only caused by increased imports, the Investigating Authority has examined the following other known factors:

a. Technology

Based on the results of the investigation, the Applicant already possesses up-to-date technology in producing the Investigated Product. This is evidenced by the fact that the Applicant's machinery is capable of manufacturing the Investigated Product into various types of fabrics utilizing advanced technology, including fabric dyeing machinery and printing machinery for *Batik* patterns as well as other designs. Accordingly, the serious injury suffered by the Applicant cannot be attributed to technological factors.

b. Quality

The quality of the goods produced by the Applicant complies with both national and international standards, as evidenced by certifications such as SNI (0560:2008, 08-1793-1990, 0276:2009, 0562:2009) and OEKO-TEX (an international certification ensuring textile product safety from hazardous chemicals/ toxic substances). Accordingly, the goods produced by the Applicant are, in terms of quality, fully competitive with imported goods, as they conform to both domestic and international standards.

c. Proportion of National Consumption to National Production Capacity

Table 6. Installed Capacity and National Consumption

Description	Unit	Year			
		2021	2022	2023	2024
National Consumption Relative to National Production Capacity	%	37.1	40.2	41.2	48.5

Source: As verified by the Investigating Authority.

As shown in Table above, it is observed that during the period 2021–2024, national consumption never exceeded national installed capacity. Accordingly, domestic demand could be adequately supplied by the Domestic Industry.

Based on the facts of 2.a. to 2.c. above, it can be concluded that during the period of investigation there were no other factors that caused a serious injury to the Applicant other than increased volume of imports of the Subject Goods.

3. Causal Link

The Investigating Authority has examined all relevant factors having a bearing in the Applicant situation, and came into a conclusion that serious injury suffered by the Applicant mainly caused by increased volume of imports and not due to the other factors, as follows:

- a) There was a surge increase of Subject Goods in absolute terms in 2021-2024 with a trend of 5.89%.
- b) There was a surge increase of Subject Goods in relative to domestic production in 2021-2024 with a trend of 19.87%.
- c) Import's market share has increased with a trend of 13.85% in 2021-2024.
- d) It is observed that while the market share of imports increased by a trend of 13.85%, the market share of the Applicant declined by a trend of 3.27%.
- e) The downward trend in production, domestic sales, productivity, utilization capacity, employment, and financial losses.
- f) There were no other factors that caused a serious injury to the Applicant other than increased volume of imports of the Subject Goods.

D. DESCRIPTION OF THE PROPOSED SUBJECT GOODS

Cotton Fabric under 25 Harmonized System (HS.) 8-digit code of Indonesian Customs Tariff Book (BTKI) 2022: 5208.21.00, 5208.22.00, 5208.31.90, 5208.33.00, 5208.51.10, 5208.52.10, 5209.11.90, 5209.21.00, 5209.31.00, 5209.49.00, 5209.51.10, 5209.59.10, 5210.21.00, 5210.32.00, 5210.51.10, 5210.59.10, 5210.59.90, 5211.31.00, 5211.59.10, 5211.59.90, 5212.15.10, 5212.15.90, 5212.21.00, 5212.23.00, and 5212.25.10.

E. DESCRIPTION OF THE PROPOSED MEASURE

In a view of the findings, a safeguard measures have been proposed in form of specific duty with HS code, proposed date of introduction, and expected duration of the measure as follow:

Table 7. The Proposed Safeguard Measures

No.	HS Number	Unit	Safeguard Measures (<i>Specific Duty</i>)		
			Period I	Period II	Period III
1	5208.21.00	Rp/ Meter	9,577	9,013	8,482
2	5208.22.00	Rp/ Meter	9,467	8,909	8,384
3	5208.31.90	Rp/ Meter	9,610	9,044	8,511
4	5208.33.00	Rp/ Meter	9,415	8,860	8,338
5	5208.51.10	Rp/ Meter	10,585	9,962	9,375
6	5208.52.10	Rp/ Meter	14,702	13,836	13,021
7	5209.11.90	Rp/ Meter	10,624	9,998	9,409
8	5209.21.00	Rp/ Meter	9,646	9,077	8,543
9	5209.31.00	Rp/ Meter	9,338	8,788	8,271
10	5209.49.00	Rp/ Meter	9,228	8,685	8,173
11	5209.51.10	Rp/ Meter	16,974	15,974	15,033
12	5209.59.10	Rp/ Meter	16,740	15,754	14,827
13	5210.21.00	Rp/ Meter	8,785	8,268	7,781
14	5210.32.00	Rp/ Meter	9,501	8,942	8,415
15	5210.51.10	Rp/ Meter	20,675	19,457	18,311
16	5210.59.10	Rp/ Meter	21,144	19,898	18,726
17	5210.59.90	Rp/ Meter	10,887	10,246	9,643
18	5211.31.00	Rp/ Meter	9,467	8,910	8,385
19	5211.59.10	Rp/ Meter	18,590	17,495	16,464
20	5211.59.90	Rp/ Meter	12,668	11,922	11,220
21	5212.15.10	Rp/ Meter	14,042	13,215	12,437
22	5212.15.90	Rp/ Meter	13,127	12,354	11,627
23	5212.21.00	Rp/ Meter	9,639	9,071	8,537

No.	HS Number	Unit	Safeguard Measures (<i>Specific Duty</i>)		
			Period I	Period II	Period III
24	5212.23.00	Rp/ Meter	10,750	10,117	9,521
25	5212.25.10	Rp/ Meter	13,966	13,143	12,369

In view of the conclusion of the causal link, the Investigating Authority has proposed to the Government of the Republic of Indonesia to impose a safeguard measure on the importation of the Subject Goods for three periods.

The imposition of the safeguard measures will be carried out in accordance with the Article 2.2 and Article 9 of the WTO Agreement on Safeguards.

According to Article 9.1 of the WTO Agreement on Safeguards, developing country Members with less than 3% import share collectively account for not more than 9% of total imports in the subject goods are excluded from the safeguard measures.

F. PROVIDE PROPOSED DATE OF THE APPLICATION OF THE MEASURE

The safeguard measure is proposed to enter into force after the publication of the decree of the Minister of Finance of the Republic of Indonesia, which will be promulgated at the Official Gazette.

G. CONSULTATIONS

Members who have a substantial interest of the Subject Goods, shall submit a written request of consultation within a period of 7 days from the date of circulation of this notification. All written requests must be sent both in written letter and in electronic format, and must indicate the name, address, e-mail address, and phone fax number of the Members.

In Accordance with Article 12.3 WTO Agreement on Safeguard, the Government of the Republic of Indonesia is open for consultation in order to provide opportunities for those Members, consultation is scheduled to be held virtually.

The contact information for correspondence is:

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**LAPORAN AKHIR HASIL PENYELIDIKAN
TINDAKAN PENGAMANAN PERDAGANGAN
ATAS BARANG IMPOR KAIN TENUNAN DARI KAPAS**

**25 NO. HS 8-DIGIT BERDASARKAN BUKU TARIF
KEPABEANAN INDONESIA 2022**

VERSI TIDAK RAHASIA

**KOMITE PENGAMANAN PERDAGANGAN INDONESIA (KPPI)
2025**

EXECUTIVE SUMMARY

1. **Kain Tenunan dari Kapas** yang terbuat dari Benang Kapas, merupakan bahan baku untuk membuat Pakaian dan Aksesori Pakaian, misalnya *syal*, kaos kaki, handuk, *sprei*, dan produk lainnya.
2. **Pemohon adalah Asosiasi Pertekstilan Indonesia (API)** yang mewakili 9 perusahaan dengan proporsi produksi sebesar **55,2%**, yang terdiri dari:

(1) PT. Delta Merlin Dunia Tekstil	(6) PT. Senang Kharisma
(2) PT. Dunia Setia Sandang Asli Tekstil	(7) PT. Kosoema Nanda Putra
(3) PT. Damaitex	(8) PT. Agung Sejahtera Sidoraharjatex
(4) PT. Sari Warna Asli	(9) PT. Sri Rejeki Isman
(5) PT. Djohartex	
3. Dari hasil penyelidikan KPPI tahun 2021 – 2024, telah terjadi **lonjakan volume impor secara absolut dan relatif** pada impor Kain Tenunan dari Kapas dengan tren sebesar 5,89% dan 19,87% yang menyebabkan kerugian serius IDN yang dilihat dari tren penurunan:
 - (1) Produksi -10,21%
 - (2) Penjualan Domestik -10,45%
 - (3) Produktivitas -3,84%
 - (4) Kapasitas Terpakai -10,31%
 - (5) Tenaga Kerja -6,62%
 - (6) Kerugian finansial -58,17%.

Terdapat hubungan sebab akibat bahwa adanya lonjakan jumlah impor yang menyebabkan terjadinya kerugian serius dan tidak ada faktor lain yang menyebabkan kerugian serius pada Pemohon.
4. Lonjakan jumlah impor, khususnya tahun 2024 didominasi oleh **Rep. Rakyat Tiongkok (82,40%), Viet Nam (5,04%), India (4,84%), dan Hong Kong (3,09%)** yang tidak dapat diprediksi sebelumnya (*Unforeseen Development*). Hal ini disebabkan perang dagang AS-RRT, peningkatan produksi Kain Tenunan dari Kapas di India, dan peningkatan kapasitas produksi tekstil di Viet Nam.
5. KPPI merekomendasikan pengenaan **Bea Masuk Tindakan Pengamanan (BMTP)** selama **3 (tiga) tahun** terhadap impor produk “**Kain Tenunan dari Kapas**” yang terdiri dari **25 No. HS 8-digit**, yaitu:

Periode	BMTP <i>Specific Duty</i>
Tahun I	Rp. 8.785/m s.d Rp. 21.144 /m
Tahun II	Rp. 8.268/m s.d Rp. 19.898 /m
Tahun III	Rp. 7.781 /m s.d Rp. 18.726 /m

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KATA PENGANTAR

Puji syukur kita panjatkan ke hadirat Tuhan Yang Maha Esa yang telah memberikan rahmat dan hidayah-Nya, sehingga Komite Pengamanan Perdagangan Indonesia (KPPI) dapat menyelesaikan penyelidikan pengenaan Tindakan Pengamanan Perdagangan (TPP) atas barang impor Kain Tenunan dari Kapas dalam rangka pemulihan dan pencegahan atas kerugian/ ancaman kerugian serius yang dialami oleh Industri Dalam Negeri (IDN) akibat terjadinya lonjakan jumlah barang impor, sebagaimana telah diamanatkan dalam ketentuan Pasal 95 ayat (1) Peraturan Pemerintah No. 34 Tahun 2011 tentang Tindakan Antidumping, Tindakan Imbalan, dan Tindakan Pengamanan Perdagangan (PP 34 Tahun 2011).

Tujuan dari penyelidikan yang dilakukan adalah untuk membuktikan bahwa kerugian serius/ ancaman kerugian serius yang dialami oleh IDN merupakan akibat dari terjadinya lonjakan jumlah barang impor sebagaimana telah diatur dalam ketentuan Pasal 70 ayat (1) PP 34 Tahun 2011.

Secara khusus ucapan terima kasih disampaikan kepada Bapak Dr. Budi Susanto, M.Si. selaku Menteri Perdagangan atas dukungan yang diberikan kepada KPPI dalam melaksanakan penyelidikan, dan juga kepada Kementerian/Lembaga, IDN, serta pihak yang berkepentingan lainnya atas dukungan yang diberikan selama penyelidikan dilaksanakan.

Akhir kata, kami berharap semoga Laporan Akhir penyelidikan pengenaan Tindakan Pengamanan terhadap barang impor Kain Tenunan dari Kapas ini dapat bermanfaat bagi pihak lain yang berkepentingan khususnya dalam rangka memberikan perlindungan kepada Industri Dalam Negeri (IDN) Indonesia.

Jakarta, September 2025

Julia Gustaria Silalahi
Ketua KPPI

A. PENDAHULUAN

A.1. Latar Belakang

1. Pada tanggal 18 September 2023, Komite Pengamanan Perdagangan Indonesia (KPPI) menerima Permohonan dari Asosiasi Pertekstilan Indonesia (API), yang selanjutnya disebut sebagai Pemohon, untuk melakukan penyelidikan dalam rangka pengenaan Tindakan Pengamanan Perdagangan (TPP) terhadap impor barang “Kain Tenunan dari Kapas” dengan **33 (tiga puluh tiga)** No. *Harmonized System* (HS) 8-digit, sesuai Buku Tarif Kepabeanan Indonesia (BTKI) tahun 2022 yaitu No. HS.

5208.21.00, 5208.22.00, 5208.31.90, 5208.33.00, 5208.41.90, 5208.42.10, 5208.42.90, 5208.43.00, 5208.52.10, 5208.59.20, 5208.59.90, 5209.11.10, 5209.11.90, 5209.19.00, 5209.21.00, 5209.31.00, 5209.49.00, 5209.51.10, 5210.21.00, 5210.32.00, 5210.41.10, 5210.49.00, 5210.51.10, 5210.59.10, 5210.59.90, 5211.31.00, 5211.32.00, 5211.39.00, 5211.59.10, 5211.59.90, 5212.15.90, 5212.21.00, 5212.23.00.

2. Sesuai dengan Peraturan Pemerintah Nomor 34 Tahun 2011 (PP 34/2011) tentang Tindakan Antidumping, Tindakan Imbalan, dan Tindakan Pengamanan Perdagangan, KPPI melakukan penelitian atas bukti awal permohonan penyelidikan dalam rangka pengenaan TPP terhadap impor Kain Tenunan dari Kapas. Dari hasil analisa bukti awal tersebut, terdapat lonjakan jumlah impor barang dimaksud selama periode tahun 2019-2022, serta Kerugian Serius atau Ancaman Kerugian Serius yang dialami oleh Pemohon akibat lonjakan jumlah impor barang dimaksud.
3. Sehubungan dengan hal tersebut, maka berdasarkan surat **No. PI.02/147/KPPI/10/2023 tanggal 16 Oktober 2024 KPPI memutuskan menerima permohonan dan menetapkan dimulainya penyelidikan TPP terhadap impor barang Kain Tenunan dari Kapas pada tanggal 27 Oktober 2023**, yang langsung diumumkan melalui surat kabar Bisnis Indonesia dan *website* Kementerian Perdagangan pada hari yang sama.
4. Selanjutnya, tanggal **1 Juli 2025** KPPI menerima permohonan kembali dari Pemohon perihal penambahan **4 (empat)** No. HS 8-digit untuk diselidiki yaitu No. HS **5208.51.10, 5209.59.10, 5212.15.10, dan 5212.25.10.**
5. Dari total **37 (tiga puluh tujuh)** No. HS 8-digit yang diajukan oleh Pemohon, terdapat sejumlah **12 (dua belas)** No. HS 8-digit yang bukan merupakan barang sejenis atau barang yang secara langsung bersaing yang menyebabkan kerugian serius atau ancaman kerugian serius Pemohon, yaitu No. HS.

5208.41.90, 5208.42.10, 5208.42.90, 5208.43.00, 5208.59.20, 5208.59.90, 5209.11.10, 5209.19.00, 5210.41.10, 5210.49.00, 5211.32.00, 5211.39.00.

Dengan demikian, ke-12 No. HS tersebut dikeluarkan dari cakupan barang yang diselidiki, sehingga total jumlah No. HS yang diselidiki menjadi **25 (dua puluh lima) No. HS 8-digit** sesuai BTKI 2022 yaitu No. HS.

5208.21.00, 5208.22.00, 5208.31.90, 5208.33.00, 5208.51.10,
 5208.52.10, 5209.11.90, 5209.21.00, 5209.31.00, 5209.49.00,
 5209.51.10, 5209.59.10, 5210.21.00, 5210.32.00, 5210.51.10,
 5210.59.10, 5210.59.90, 5211.31.00, 5211.59.10, 5211.59.90,
 5212.15.10, 5212.15.90, 5212.21.00, 5212.23.00, 5212.25.10,

Perubahan jumlah No.HS. dari permohonan hingga penyelidikan dapat dilihat pada tabel di bawah ini.

Tabel 1. Jumlah No. HS 8-digit Permohonan Awal, Permohonan Tambahan yang Dikeluarkan dari Penyelidikan, dan Yang Diselidiki

No. HS Permohonan Awal	No. HS Permohonan Tambahan	No. HS yang Dikeluarkan dari Penyelidikan	No. HS yang Diselidiki
33 No. HS	4 No. HS	12 No. HS	25 No. HS

A.2. Identitas Pemohon

6. Identitas Pemohon sebagai berikut:

Nama : Asosiasi Pertekstilan Indonesia
 Alamat : Graha Surveyor Indonesia Lt.16
 Jl. Jend. Gatot Subroto Kav.56, Jakarta Selatan
 Telp./Faks. : (021) 5272171 / 021-5272166
 E-mail : secretariat@bpnapi.org
 Contact Person : Andrew Purnama
 Jabatan : Sekretariat Jenderal API

Daftar perusahaan yang diwakili pemohon dalam penyelidikan adalah sebagaimana pada **Lampiran 1**.

A.3. Proporsi yang Besar

7. Sesuai Pasal 1 Angka 18 PP 34/2011, proporsi produksi Pemohon secara kumulatif memiliki proporsi yang besar sebesar 55,2% dari keseluruhan produksi nasional pada tahun 2024, sehingga Pemohon telah memenuhi syarat untuk mewakili IDN, seperti terlihat pada Tabel 2 di bawah.

Tabel 2. Proporsi Produksi Tahun 2024

Uraian	Proporsi (%)
Produksi Pemohon	55,2
Produksi Non Pemohon	44,8
Produksi Nasional	100

Sumber: Pemohon dan Hasil Verifikasi

8. Berdasarkan Tabel 2, Proporsi produksi Pemohon sebesar 55,2% dan proporsi produksi Non Pemohon sebesar 44,8% dari total produksi nasional. Dengan demikian Pemohon dinyatakan sudah memenuhi persyaratan *Major Proportion* sesuai *Article 4.1(c) Agreement on Safeguards* (AoS) dan Pasal 1 angka 18 PP 34/2011 untuk mewakili IDN.

A.4. Periode Penyelidikan

9. Pada saat inisiasi, penyelidikan dilakukan pada periode 2020-2022 dan selanjutnya KPPI melakukan pemutakhiran data menjadi periode 2021-2024 untuk mendapatkan data paling *recent*.

A.5. Prosedur dan Notifikasi

10. Sesuai Pasal 74 Ayat (2) PP 34/2011, tanggal 27 Oktober 2023 KPPI menyampaikan pemberitahuan secara tertulis dimulainya penyelidikan kepada Pemohon dan Pihak Yang Berkepentingan (PYB) lainnya. Pemberitahuan tersebut dimuat dalam surat kabar **Bisnis Indonesia** dan siaran pers di *website* Kementerian Perdagangan.
11. Sesuai *Article 12.1(a) WTO Agreement on Safeguards* (AoS), tanggal **27 Oktober 2023** Pemerintah RI mengirimkan Notifikasi *Article 12.1(a)* kepada *Committee on Safeguards* di WTO mengenai dimulainya penyelidikan dan tanggal **1 November 2023** notifikasi tersebut disirkulasi oleh WTO dengan nomor dokumen G/SG/N/6/IDN/40.
12. Sesuai Pasal 79 Ayat (1) PP 34/2011 dan *Article 3 WTO AoS*, tanggal **29 November 2023** KPPI menyelenggarakan **dengar pendapat (*public hearing*)** untuk memberikan kesempatan kepada PYB menyampaikan bukti, pandangan dan tanggapannya terhadap dimulainya penyelidikan TPP atas impor barang Kain Tenunan dari Kapas. Dengar pendapat tersebut dihadiri oleh perwakilan dari Pemerintah negara eksportir (Kedubes RRT, Kedubes Meksiko, Kedubes Thailand, dan Kedubes India), asosiasi eksportir (*China Chamber of Commerce for import & Export of Textile/ (CCCT)*), Kementerian/Lembaga terkait (Badan Perencanaan Pembangunan Nasional Indonesia (BAPPENAS), Direktorat Industri Tekstil Kulit dan Alas Kaki, Kemenperin, Direktorat Ketahanan dan Iklim Usaha Industri, Kemenperin, dan KPPU) serta asosiasi IDN dan Pemohon (API, PT. Sari Warna Asli Tekstil Industry dan PT. Sri Rejeki Isman).
13. Sesuai Pasal 78 Ayat (1) huruf a PP 34/2011, tanggal **19 Januari 2024** KPPI meminta penjelasan secara tertulis dalam bentuk kuesioner kepada perusahaan yang diwakili Pemohon (**Lampiran 2**) dan jawaban kuesioner telah dikembalikan kepada KPPI tanggal **6 Juni 2024** disertai dengan bukti pendukung.
14. Dalam rangka memeriksa kebenaran atas pernyataan data dan informasi, tanggal **11-14 Juni 2024** KPPI melakukan verifikasi lapangan terhadap perusahaan Pemohon.
15. Sesuai Pasal 78 Ayat (1) huruf a PP 34/2011, tanggal **5 Juli 2024** KPPI meminta penjelasan secara tertulis dalam bentuk kuesioner kepada Pemohon (API) perihal konsolidasi data perusahaan dan data nasional.

Selanjutnya, tanggal **1 Oktober 2024** API mengembalikan Jawaban Kuesioner tersebut kepada KPPI.

16. Sesuai Pasal 78 Ayat (1) huruf a PP 34/2011, tanggal **17 Januari 2025** KPPI meminta **pemutakhiran data** periode yang diselidiki (2021-2024) secara tertulis dalam bentuk kuesioner kepada Pemohon dan telah dikembalikan kepada KPPI tanggal **21 Februari 2025**.
17. Sesuai *Article* 12.1(a) dalam WTO AoS, tanggal **15 Juli 2025** Pemerintah Republik Indonesia mengirimkan Notifikasi *Article* 12.1(a) *supplement* kepada *Committee on Safeguards* di WTO mengenai penambahan 4 (empat) No. HS 8-digit yaitu HS. 5208.51.10, 5209.59.10, 5212.15.10, dan 5212.25.10. Notifikasi tersebut disirkulasi oleh WTO tanggal **16 Juli 2025** dengan nomor dokumen G/SG/N/6/IDN/40/Suppl.1.

B. PERNYATAAN PIHAK YANG BERKEPENTINGAN

B.1. Dengar pendapat (*Public Hearing*)

18. Kegiatan dengar pendapat diselenggarakan tanggal **29 November 2023** di Ruang Anggrek Lantai 12, Kementerian Perdagangan. Bukti, pandangan, serta tanggapan/ pernyataan yang disampaikan secara tertulis pada kegiatan dengar pendapat adalah:

B.1.1. Kedutaan Besar Meksiko

Pernyataan:

19. Berdasarkan data situs *Trade Map* periode 1 Januari 2020 s.d. 31 Desember 2022, tidak ada ekspor produk Kain Tenunan dari Kapas yang berasal dari Meksiko ke Indonesia. Oleh karena itu, sesuai dengan ketentuan *Article* 9.1 AoS, sebagai negara berkembang dengan pangsa impor dibawah 3%, Meksiko harus dikecualikan dalam pengenaan *safeguard*.

Jawaban KPPI atas pernyataan dari Kedutaan Besar Meksiko:

20. Jawaban poin 19 sesuai dengan hasil penyelidikan KPPI, diketahui bahwa pada tahun 2024 pangsa impor Kain Tenunan dari Kapas dari Meksiko kurang dari 3%, maka sesuai dengan ketentuan *Article* 9 AoS, Meksiko sebagai negara berkembang dikecualikan dari pengenaan *safeguard*.

B.1.2. Ditjen Impor, Kementerian Perdagangan, Republik Turkiye

Pernyataan:

21. Berdasarkan data situs *Trade Map* pada periode yang diselidiki, ekspor produk Kain Tenunan dari Kapas yang berasal dari Turkiye ke Indonesia tidak lebih dari 3%. Oleh karena itu, sesuai dengan ketentuan *Article* 9.1 AoS, sebagai negara berkembang dengan pangsa impor dibawah 3%, Turkiye harus dikecualikan dalam pengenaan *Safeguard*.

Jawaban KPPI atas pernyataan dari Ditjen Impor, Kementerian Perdagangan, Republik Turkiye:

22. Jawaban poin 21, sesuai dengan hasil penyelidikan KPPI, diketahui bahwa pada tahun 2024 pangsa impor Kain Tenunan dari Kapas dari Turkiye kurang dari 3%, maka sesuai dengan ketentuan *Article 9 AoS*, Turkiye sebagai negara berkembang dikecualikan dari pengenaan *Safeguard*.

B.1.3. Departemen Perdagangan Luar Negeri, Kerajaan Thailand

Pernyataan:

23. Pada tahun 2019-2022, impor produk Kain Tenunan dari Kapas asal Thailand berada di bawah 3%. Sesuai dengan ketentuan *Article 9.1 AoS*, sebagai negara berkembang dengan pangsa impor dibawah 3%, Thailand harus dikecualikan dalam pengenaan *Safeguard*.

Jawaban atas pernyataan dari Departemen Perdagangan Luar Negeri, Kerajaan Thailand:

24. Jawaban poin 23, sesuai dengan hasil penyelidikan KPPI, diketahui bahwa tahun 2024 pangsa impor Kain Tenunan dari Kapas dari Thailand kurang dari 3%, maka sesuai dengan ketentuan *Article 9 AoS*, Thailand sebagai negara berkembang dikecualikan dari pengenaan *Safeguard*.

B.1.4. China Chamber of Commerce for Import and Export of Textile (CCCT) diwakili oleh Yang & Co Law Office

Pernyataan CCCT tanggal 2 Desember 2023, terdiri dari:

25. Kerugian Pemohon dalam hal ini API, semata-mata disebabkan karena tidak mampu bersaing secara kualitas dan kuantitas dengan produk asing, permasalahan upah tenaga kerja, dan dampak wabah Covid-19, serta kapasitas produksi Pemohon tidak mampu untuk memenuhi konsumsi nasional. Selanjutnya, disampaikan bahwa tidak ada rencana penyesuaian struktural dari API yang akan dilakukan untuk meningkatkan daya saing.

Jawaban KPPI atas pernyataan dari CCCT tanggal 2 Desember 2023

26. Jawaban poin 25, Kerugian yang dialami Pemohon, **tidak disebabkan oleh faktor lain** seperti upah tenaga kerja dan Covid-19. Berdasarkan hasil penyelidikan KPPI, dalam memproduksi Kain Tenun dari Kapas Pemohon memiliki teknologi terbaru yang lebih efektif dan efisien yang dapat memproduksi Kain Tenun dari Kapas yang berkualitas. Selain itu, Pemohon juga memiliki **sertifikat nasional** maupun **internasional** yang dijelaskan dalam bagian Kerugian yang dialami Pemohon semata-mata disebabkan oleh terjadinya lonjakan jumlah barang impor (hal tersebut dijelaskan secara rinci dalam bagian C.2.1 dan C.3).

Berdasarkan hasil penyelidikan diketahui bahwa pada tahun 2024 kapasitas terpasang nasional **lebih besar** dari konsumsi nasional, dengan proporsi konsumsi nasional terhadap kapasitas terpasang nasional sebesar 48,5% sebagaimana dijelaskan pada poin 57.

Rencana program penyesuaian struktural yang akan dilakukan Pemohon untuk meningkatkan daya saing dijelaskan lebih rinci dalam bagian E.

B.1.5. PT. Metro Garmin**Pernyataan:**

27. PT. Metro Garmin (Importir) meminta pengecualian pemberlakuan *safeguard* untuk produsen yang mendapatkan fasilitas Kawasan Berikat, yang produknya akan dikeluarkan ke Tempat Lain Dalam Daerah Pabean.

Jawaban KPPI atas pernyataan dari PT. Metro Garmin

28. Barang impor yang masuk ke Kawasan Berikat dan dikeluarkan ke Tempat Lain Dalam Daerah Pabean dikenakan *safeguard* sesuai dengan ketentuan peraturan perundangan-undangan yang berlaku.

B.1.6. Badan Perencanaan Pembangunan Nasional Indonesia (BAPPENAS)**Pernyataan:**

29. Pada komoditas Kain Tenunan dari Kapas, data volume impor menunjukkan bahwa terdapat peningkatan namun tidak terdapat lonjakan impor pada komoditas Kain Tenunan dari Kapas.

Berdasarkan analisis BAPPENAS terhadap daya saing produk-produk tersebut melalui perhitungan *Revealed Competitive Advantage* (RCA), ditemukan banyak produk yang diajukan belum memiliki daya saing secara global yang ditunjukkan dengan skor $RCA < 1$ dan skor tersebut cenderung mengalami penurunan. Apabila akan dikenakan BMTP, diduga hal ini akan mengakibatkan penurunan daya saing lebih dalam terhadap produk tersebut.

Berdasarkan analisis tersebut BAPPENAS berpandangan bahwa tidak semua produk mengalami lonjakan impor. KPPI perlu melihat lebih detail terkait produk yang diajukan Pemohon serta mempertimbangkan dampak yang ditimbulkan ke depan bagi makro ekonomi, industri hulu hingga hilir, serta kinerja perdagangan. Adapun penyelidikan lebih lanjut dapat dilakukan hanya pada produk yang mengalami lonjakan impor.

B.1.7. Direktorat Industri Tekstil, Kulit, dan Alas Kaki, Kementerian Perindustrian**Pernyataan:**

30. Pada permohonan penyelidikan dalam rangka pengenaan TPP terhadap lonjakan jumlah impor barang kain tenunan dari kapas, terdapat kode HS produk kain yang dicetak dengan proses batik dan tenun ikat yang diajukan Pemohon. Sehubungan dengan hal tersebut Kemenperin mengharapkan KPPI dapat memastikan Pemohon memiliki izin usaha dengan KBLI 13122-Industri Kain Tenun Ikat untuk Pemohon yang memproduksi Kain Tenun Ikat. Hal ini terkait dengan persyaratan investasi bagi kedua KBLI tersebut sebagaimana diatur pada Peraturan Presiden Nomor 10 Tahun 2021 jo. Peraturan Presiden Nomor 49 Tahun 2021 tentang Bidang Usaha Penanaman modal.

Semua Permohonan perlu dipastikan kesesuaian antara kode HS dengan barang yang diselidiki dengan barang yang dihasilkan oleh Pemohon (IDN).

B.1.8. Direktorat Teknis Kepabeanan, Kementerian Keuangan

Pernyataan:

31. Kemenkeu menyampaikan beberapa tanggapan sebagai berikut:

- a. Kemenkeu mendukung pengenaan BMTP terhadap barang impor sesuai ketentuan yang berlaku, namun tetap harus mempertimbangkan kemudahan pelaksanaan pemungutannya sesuai Pasal 84 ayat 7 pada PP Nomor 34 Tahun 2011 tentang Tindakan Antidumping, Tindakan Imbalan, dan Tindakan Pengamanan Perdagangan;
- b. KPPI sebaiknya mempertimbangkan aspek kemudahan implementasi dan penegakan hukum dalam melaksanakan ketentuan BMTP, DJBC selaku institusi yang mengawal dalam melakukan pengawasan terhadap efektivitas pengenaan BMTP, memerlukan dasar hukum yang kuat dan mendorong percepatan penerbitan peraturan legal yang digunakan sebagai *tools* dalam melakukan pengenaan BMTP, yaitu Rancangan Peraturan Pemerintah tentang Tindakan Pengamanan, Tindakan Anti dumping dan Tindakan Imbalan (RPP TPTATI), dan Rancangan Permendag yang mengatur tentang ketentuan Surat Keterangan Asal Non Preferensi;
- c. Sebaiknya, KPPI mempertimbangkan juga aspek efektivitas dan keadilan pengenaan BMTP, serta pengenaannya menggunakan tarif spesifik, sehingga dapat meminimalisir praktik *under invoicing* dan manipulasi nilai pabean, serta dapat menimbulkan kepastian dalam dunia usaha;
- d. Selanjutnya, aspek kemudahan implementasi dari sisi pengawasan terhadap barang impor di lapangan, diusulkan agar pengenaan BMTP dilakukan setidaknya terhadap keseluruhan pos tarif di tingkat subpos HS yang sama, sehingga dapat meminimalisir tingkat kesulitan pengawasan yang dapat berdampak pada bertambahnya *dwelling time*, serta dapat mengantisipasi terjadinya praktik *circumvention* pengalihan kode HS ke barang impor yang tidak dikenakan BMTP;
- e. Sehubungan dengan hal tersebut, pada butir d di atas diusulkan agar dilakukan pembahasan internal lebih lanjut dan secara mendalam.

B.2. Pernyataan Lainnya

Pernyataan yang disampaikan melalui surat/ surat elektronik (*email*) selama penyelidikan.

Surat tanggal 25 Maret 2024 dari *China Chamber of Commerce for Import and Export of Textile (CCCT)* diwakili oleh Yang & Co Law Office:

32. Pengenaan *Safeguard* untuk kain tenunan dari kapas harus ditolak karena alasan sebagai berikut:

- 1) Unsur *Safeguards* sebagaimana diatur dalam Pasal 70 PP 34/2011 tidak terpenuhi karena impor Barang Yang Diselidiki tidak mengancam industri dalam negeri. Selain itu, Barang Yang Diselidiki bukan

merupakan produk yang bersaing langsung dengan produk dalam negeri. Lebih lanjut, tidak ada hubungan sebab akibat antara impor produk yang diselidiki dengan kerugian industri dalam negeri. Oleh karena produk lokal dan produk impor tidak bersaing secara langsung dan kerugian industri dalam negeri disebabkan oleh adanya impor ilegal.

- 2) Pemerintah telah melindungi industri lokal melalui Permendag 3/2024 untuk Barang Yang Diselidiki, oleh karena itu penerapan bea masuk *Safeguard* akan membuat Pemohon terlalu terlindungi, tidak dapat berkembang, dan tidak dapat bersaing dengan perdagangan internasional. Selain itu, tindakan *Safeguard* juga berdampak pada kepentingan nasional, seperti industri garmen lokal yang menggunakan kain katun yang diimpor dari Tiongkok sebagai bahan bakunya. Dengan adanya pengenaan *Safeguard*, industri garmen lokal harus membeli kain katun secara impor dengan harga yang lebih tinggi dan akan mengancam industri garmen dalam negeri.

Jawaban KPPI atas Pernyataan CCCT tanggal 25 Maret 2024

33. Jawaban poin 32, terkait dengan pernyataan CCCT pada tanggal 25 Maret 2024, disampaikan sebagai berikut:

- 1) Berdasarkan hasil penyelidikan, diketahui bahwa Pemohon mengalami kerugian serius yang diakibatkan oleh adanya lonjakan jumlah impor barang sejenis/secara langsung bersaing yang dijelaskan lebih lanjut pada bagian C, hal tersebut telah memenuhi persyaratan pengenaan Tindakan Pengamanan sebagaimana telah diatur dalam ketentuan AoS Art. 2.1. dan PP 34 Tahun 2011 Pasal 70. Terkait dengan hubungan sebab – akibat, dijelaskan lebih lanjut dalam bagian C.4.
- 2) Tindakan Pengamanan merupakan pengenaan terpisah dan tidak berkaitan dengan instrumen lainnya, dan berdasarkan hasil penyelidikan, rekomendasi Tindakan Pengamanan terhadap impor produk Kain Tenun dari Kapas telah memenuhi persyaratan yang telah diatur dalam AoS dan PP 34 Tahun 2011.

Surat tanggal 30 Juli 2025 dari *China Chamber of Commerce for Import and Export of Textile (CCCT)* diwakili oleh Yang & Co Law Office:

34. Penyelidikan atas tuduhan Tindakan Pengamanan atas Impor Barang Yang Diselidiki ("Penyelidikan Tindakan Pengamanan/ Penyelidikan *Safeguards*") sudah berlangsung sejak dimulainya penyelidikan oleh KPPI pada tanggal 27 Oktober 2023. Berdasarkan notifikasi *supplement* 12.1(a) No. G/SG/N/6/IDN/40/Suppl.1 tanggal 16 Juli 2025, CCCT menyampaikan sebagai berikut:

- a. Perihal penambahan lingkup No. HS, tidak ada informasi jumlah impor atas tambahan Barang Yang Diselidiki yang menunjukkan adanya indikasi lonjakan jumlah barang impor maupun tidak ada bukti-bukti awal mengenai adanya kerugian serius atau ancaman kerugian serius dari Pemohon dan industri dalam negeri mengenai impor dari tambahan Barang Yang Diselidiki tersebut.

- b. Pasal 78 ayat 1 (a) dan ayat 2 dari Peraturan Pemerintah No. 34 Tahun 2011 tentang Tindakan Antidumping, Tindakan Imbalan, dan Tindakan Pengamanan Perdagangan ("PP No. 34/2011") juga mensyaratkan agar setiap informasi dan penjelasan yang diminta dan diterima oleh KPPI dari Pemohon, importir dan pihak terkait harus dibuat dalam versi rahasia dan tidak rahasia.

Secara alternatif, CCCT memohon KPPI untuk mempertimbangkan agar Penyelidikan *Safeguard* dihentikan dan KPPI dapat memulai penyelidikan baru terhadap Tambahan Barang yang Diselidiki.

Jawaban KPPI atas Pernyataan CCCT tanggal 30 Juli 2025

35. Berdasarkan masukan CCCT pada poin 34, dapat kami sampaikan sebagai berikut:

- 1) Sesuai dengan ketentuan *Article 12* AoS dan Pasal 92 PP 34/2011, adapun pemberitahuan (notifikasi) **hanya wajib dilakukan** kepada Komite *Safeguards* WTO, notifikasi tersebut terdiri dari:
 - a) Dimulainya penyelidikan dalam rangka pengenaan Tindakan Pengamanan;
 - b) Pengenaan Tindakan Pengamanan Sementara;
 - c) Temuan Penyelidikan Tindakan Pengamanan;
 - d) Pengenaan Tindakan Pengamanan.

Dalam penyelidikan, KPPI telah memenuhi kewajiban notifikasi sebagaimana telah diatur dalam *Art. 12* AoS diatas, notifikasi tersebut dapat diunduh di website WTO (www.wto.org) dan website KPPI (www.kppi.kemendag.go.id). KPPI juga menerapkan keterbukaan (transparansi), KPPI selalu menginformasikan setiap pembaharuan dalam penyelidikan ke Komite *Safeguards* WTO, salah satunya yaitu tentang penambahan No. HS. yang diselidiki melalui notifikasi No. G/SG/N/6/IDN/40/Suppl.1. tanggal 16 Juli 2025.

KPPI **wajib menjaga** setiap data yang dinyatakan rahasia oleh pemberi data, sebagaimana diatur dalam ketentuan *Art. 3.2.* AoS dan Pasal 78 ayat (3) PP 34/2011. Oleh karena itu, setiap permintaan Pihak Yang Berkepentingan (PYB) terkait data penyelidikan tidak dapat diberikan jika tidak mendapatkan izin dari pemberi data.

- 2) Terkait dengan penambahan No. HS yang diselidiki adalah merupakan tindakan **yang sah** untuk dilakukan, sebagaimana diatur dalam ketentuan *Art. 4.2(a)* AoS:

"In the investigation to determine whether increased imports have caused or are threatening to cause serious injury to a domestic industry under the terms of this Agreement, the competent authorities shall evaluate all relevant factors of an objective and quantifiable nature having a bearing on the situation of that industry, in particular, the rate and amount of the increase in imports of the product concerned in absolute and relative terms, the share of the domestic market taken by increased imports, changes in the level of sales, production, productivity, capacity utilization, profits and losses, and employment".

Hal tersebut juga kemudian dikonfirmasi oleh keputusan panel yang menangani gugatan (*dispute*) Turkiye terhadap pengenaan Tindakan Pengamanan barang *Certain Steel Products* – UE, panel pada pokok putusannya **memperbolehkan Komisi Eropa** untuk memeriksa produk (menambah barang) yang diselidiki secara terperinci.

*“Given that it applied the definitive safeguard on a product comprising 26 product categories, taken together, the European Commission was required, at a minimum, to investigate the existence of the necessary circumstances and conditions for that product. At the same time, this **did not preclude** the European Commission from examining that product, additionally, at a more disaggregated level”.*

Sesuai dengan ketentuan Art. 4.2(a) AoS dan putusan panel di atas, maka dapat disimpulkan bahwa selama masa penyelidikan otoritas **dapat melakukan pengujian (eksaminasi) mendalam** terhadap semua faktor yang relevan, termasuk menambah atau mengurangi cakupan barang yang diselidiki.

3) Sebagaimana telah diatur dalam ketentuan Art. 2.1. AoS:

*“A Member may apply a safeguard measure to a product only if that Member has determined, pursuant to the provisions set out below, that such product is being imported into its territory in such **increased quantities, absolute or relative to domestic production, and under such conditions as to cause or threaten to cause serious injury to the domestic industry** that produces like or directly competitive products”.*

dan Pasal 70 ayat (1) PP 34/2011:

“Terhadap barang impor selain dikenakan Bea Masuk dapat dikenakan Tindakan Pengamanan jika:

- a) terjadi **lonjakan jumlah impor secara absolut atau relatif** atas barang yang sama dengan Barang Sejenis atau Barang Yang Secara Langsung Bersaing; dan
- b) lonjakan jumlah impor barang sebagaimana dimaksud pada huruf a menyebabkan terjadinya **Kerugian Serius atau Ancaman Kerugian Serius** terhadap Industri Dalam Negeri”.

Maka sesuai dengan hasil penyelidikan KPPI, pengenaan Tindakan Pengamanan terhadap impor Kain Tenunan dari Kapas telah **memenuhi persyaratan** di atas, yang dijelaskan lebih lanjut pada bagian C.2 dan C.3.

C. PENYELIDIKAN

C.1. Pembuktian Barang Sejenis atau Barang Yang Secara Langsung Bersaing

36. Dalam rangka melakukan pembuktian Barang Yang Diselidiki merupakan Barang Sejenis atau secara langsung bersaing dengan Kain Tenunan dari Kapas yang diproduksi Pemohon, KPPI telah meminta bukti data dan informasi melalui pengiriman kuesioner dan verifikasi lapangan ke Pemohon. Selain itu, KPPI juga mendapatkan bukti data dan informasi mengenai spesifikasi barang yang diimpor dari Importir dan asosiasi produsen asal impor Barang Yang Diselidiki.

C.1.1. Kain Tenunan Dari Kapas Yang Diproduksi Pemohon

37. Karakteristik, alur proses produksi, bahan baku, spesifikasi teknis, dan kegunaan dari kain tenunan dari kapas yang diproduksi oleh Pemohon adalah sebagai berikut:

Karakteristik Fisik

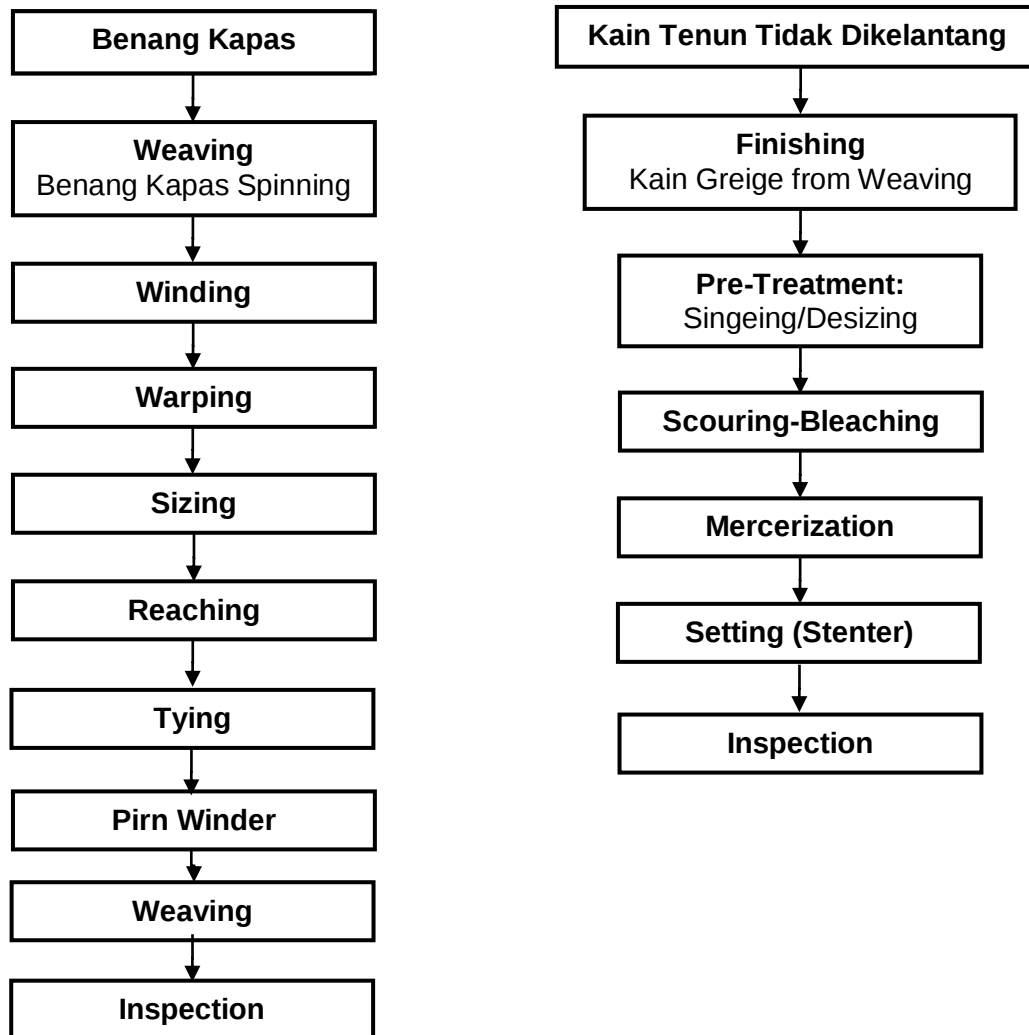
Barang produksi Pemohon memiliki karakteristik fisik :

- 1) Tidak dikelantang, yaitu kain yang memiliki warna alami dari serat pembentuknya, belum dikelantang, dicelup atau dicetak.
- 2) Dikelantang, yaitu:
 - telah melalui proses pengelantangan (*bleached*).
 - mengandung benang yang telah dikelantang.
 - mengandung campuran benang yang dikelantang dan tidak dikelantang.
- 3) Dichelup, yaitu:
 - dicelup dengan satu macam warna yang seragam, selain warna putih.
 - mengandung benang yang berwarna seragam.
- 4) Dari benang aneka warna, yaitu kain tenunan (selain kain yang dicetak) yang:
 - mengandung benang dengan warna yang berbeda, atau benang berwarna sama namun memiliki nuansa yang berbeda.
 - mengandung benang dikelantang atau tidak dikelantang dan benang berwarna.
- 5) Dicetak, yaitu kain tenunan yang telah melalui proses pencetakan, apakah itu mengandung benang aneka warna maupun tidak, termasuk kain tenun yang dicetak dengan pola, seperti dengan alat semprot (*spray gun*) atau kuas (*brush gun*), dengan sablon, atau proses batik.

Alur Proses Produksi

Alur proses produksi kain tenunan dari kapas sebagai berikut:

Gambar 1. Alur Proses Produksi Kain Tenunan dari Kapas



Sumber: Pemohon

Keterangan:

- *Winding*: proses penggulungan benang dari bentuk *cops/ pallet* diubah menjadi gulungan *cones*.
- *Warping*: proses pemindahan gulungan benang lusi dari *cones/ chese* menjadi gulungan *beam warping* dengan sejajar dan rata.
- *Sizing*: merupakan proses pelapisan benang lusi dengan larutan kanji guna memperkuat benang saat proses pertenunan dan meningkatkan daya tahan terhadap gesekan.
- *Reaching*: proses memasukkan benang lusi ke dalam lubang *dropper gun*, dan sisir tenun sesuai dengan anyaman yang akan diproduksi.

- *Tying*: proses penyambungan benang lusi dari *beam sizing* ke *beam* tenun dengan konstruksi yang sama.
- *Pin winder*: proses pemindahan gulungan benang pakan dari bentuk *cones* kebentuk *pallet* guna *sulpay mesin shuttle*.
- *Weaving*: proses penyilangan benang lusi dan benang pakan dengan sudut 90 derajat sehingga membentuk sebuah anyaman kain tenun.
- *Inspection*: proses pemeriksaan hasil kain tenun untuk mengidentifikasi *grade kain greige*.
- *Pre-treatment*: proses pembersihan kotoran dari proses sebelumnya dengan pembakaran bulu, dan perontokan sisa kanji pada proses *sizing*.
- *Scouring/ bleaching*: proses pemutihan kain.
- *Mercerization*: proses penambahan daya serap kain untuk penyerapan warna.
- *Setting/ stenter*: proses pelebaran kain kearah lebar kain, untuk mendapatkan lebar kain yang seragam.
- *Inspecting*: proses pemeriksaan hasil produksi

Bahan Baku

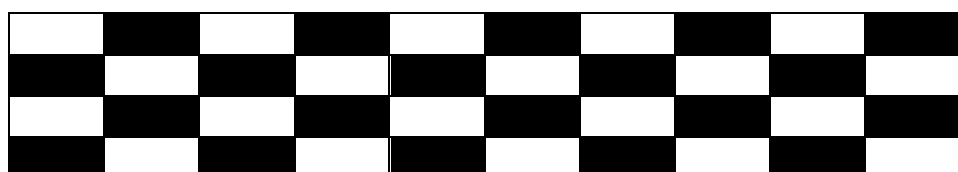
Barang Produksi Pemohon memiliki bahan baku yang sama dengan barang impor, yaitu: benang kapas.

Spesifikasi Teknis

Spesifikasi teknis dari barang kain tenunan dari kapas Pemohon adalah:

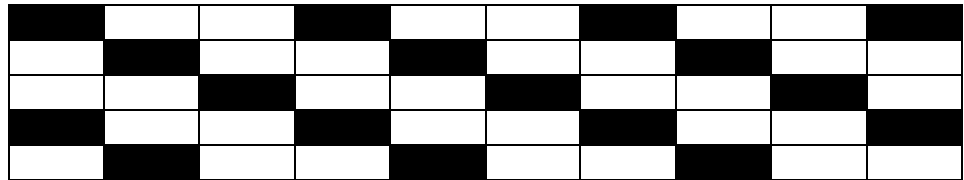
- 1) Kandungan kapas pada kain tenunan:
 - mengandung kapas 85% atau lebih menurut beratnya
 - mengandung kapas kurang dari 85% menurut beratnya, dicampur terutama atau semata-mata dengan serat buatan.
 - lainnya dari kapas.
- 2) Berat kain tenunan:
 - berat kain tidak lebih dari 200 g/m² dan
 - berat kain lebih dari 200 g/m².
- 3) Konstruksi kain tenunan:
 - Kain tenunan polos adalah konstruksi kain yang dibuat dengan menyilangkan benang pakan di atas benang lusi dan berikutnya di bawah benang lusi secara bergantian dan terus berulang.

Contoh gambar kain tenunan polos:



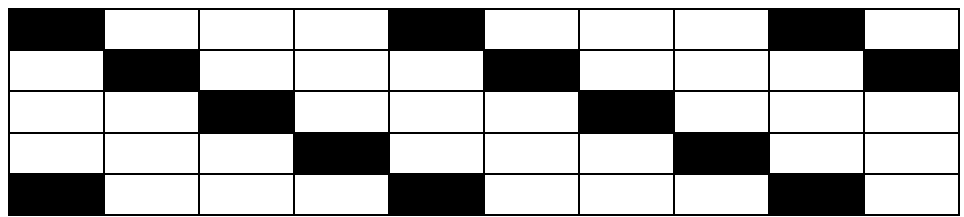
- **Kain tenunan kepar-3 benang** adalah konstruksi kain yang dibuat dengan menyilangkan benang pakan di atas benang lusi yang pertama dan berikutnya melewati 2 (dua) helai benang lusi dan terus berulang.

Contoh gambar kain tenunan kepar-3 benang:



- **Kain tenunan kepar-4 benang** adalah konstruksi kain yang dibuat dengan menyilangkan benang pakan di atas benang lusi yang pertama dan berikutnya melewati 3 (tiga) helai benang lusi dan terus berulang.

Contoh gambar kain tenunan kepar-4 benang:



- **Kain denim** adalah konstruksi kain yang dibuat untuk membuat bahan *jeans*.

Contoh gambar kain denim:



Kegunaan

Barang Produksi Pemohon memiliki kegunaan yang sama dengan barang impor, yaitu sebagai bahan baku pakaian dan aksesoris pakaian.

C.1.2. Barang Impor

38. Sesuai dengan Pasal 1 Angka 27 PP 34/2011, Barang Yang Diselidiki adalah barang impor yang mengalami lonjakan jumlah, menjadi objek penyelidikan, dinyatakan dengan uraian dan spesifikasi barang serta nomor pos tarif sesuai BTKI.
39. Berdasarkan penyelidikan, barang impor yang diselidiki berdasarkan BTKI 2022 adalah:

Kain Tenunan dari Kapas dengan 25 (dua puluh lima) No. HS 8-digit yaitu

5208.21.00, 5208.22.00, 5208.31.90, 5208.33.0, 5208.51.10, 5208.52.10, 5209.11.90, 5209.21.00, 5209.31.00, 5209.49.00, 5209.51.10, 5209.59.10, 5210.21.00, 5210.32.00, 5210.51.10, 5210.59.10, 5210.59.90, 5211.31.00, 5211.59.10, 5211.59.90, 5212.15.10, 5212.15.90, 5212.21.00, 5212.23.00, 5212.25.10.

40. Karakteristik, Bahan Baku, Spesifikasi Teknis, dan Kegunaan dari Barang Impor adalah sebagai berikut:

Karakteristik

Karakteristik barang impor kain tenunan dari kapas sama dengan karakteristik yang diproduksi oleh Pemohon seperti pada poin 37.

Bahan Baku

Bahan baku barang impor pada umumnya sama dengan yang diproduksi oleh Pemohon seperti yang tertera pada poin 37.

Spesifikasi Teknis

Spesifikasi teknis barang impor pada umumnya sama dengan yang diproduksi oleh Pemohon seperti yang tertera pada poin 37.

Kegunaan

Kegunaan dari barang impor sama dengan yang diproduksi Pemohon yaitu seperti pada poin 37.

C.1.3. Kesimpulan Pembuktian Barang Yang Diselidiki

41. Berdasarkan penjelasan 37-40, dapat disimpulkan bahwa barang impor Kain Tenunan dari Kapas dengan 25 (dua puluh lima) No. HS 8-digit yaitu:

5208.21.00, 5208.22.00, 5208.31.90, 5208.33.00, 5208.51.10, 5208.52.10, 5209.11.90, 5209.21.00, 5209.31.00, 5209.49.00, 5209.51.10, 5209.59.10, 5210.21.00, 5210.32.00, 5210.51.10, 5210.59.10, 5210.59.90, 5211.31.00, 5211.59.10, 5211.59.90, 5212.15.10, 5212.15.90, 5212.21.00, 5212.23.00, 5212.25.10,

sesuai BTKI tahun 2022 (**Lampiran 2**), merupakan **Barang Sejenis atau Barang Yang Secara Langsung Bersaing dengan barang yang diproduksi Pemohon** karena memiliki kesamaan karakteristik, bahan baku, spesifikasi teknis, dan kegunaan.

C.2. Lonjakan Jumlah Impor Barang Yang Diselidiki

C.2.1. Lonjakan Jumlah Impor Secara Absolut

Tabel 3. Total Jumlah Impor Barang Yang Diselidiki Secara Absolut

Deskripsi	Tahun				Pertumbuhan (%)			Tren (%)
	2021	2022	2023	2024	2021 - 2022	2022 - 2023	2023 - 2024	2021 - 2024
Jumlah Impor (ton)	16.963	20.909	20.580	20.637	23,26	(1,58)	0,28	5,89

Sumber: Pusat Data Sistem Informasi (PDSI) Kemendag, BPS, diolah.

42. Berdasarkan Tabel 3 di atas, periode 2021-2024 jumlah impor secara absolut mengalami tren peningkatan sebesar 5,89%. Pada tahun 2021 jumlah impor sebesar 16.963 ton meningkat menjadi 20.909 ton pada tahun 2022 atau sebesar 23,26%. Kemudian di tahun 2023 jumlah impor turun menjadi 20.580 ton atau sebesar 1,58%, dan selanjutnya tahun 2024 jumlah impor mengalami peningkatan kembali menjadi 20.637 ton atau sebesar 0,28%.

C.2.2. Lonjakan Jumlah Impor Secara Relatif Terhadap Produksi Nasional

Tabel 4. Impor Relatif Keseluruhan Barang Yang Diselidiki Dibandingkan Produksi Nasional

Deskripsi	Tahun				Pertumbuhan (%)			Tren (%)
	2021	2022	2023	2024	2021 - 2022	2022 - 2023	2023 - 2024	2021 - 2024
Jumlah Impor (ton)	16.963	20.909	20.580	20.637	23,26	(1,58)	0,28	5,89
Produksi Nasional (Indeks)	100	87,98	76,19	69,39	(12,02)	(13,39)	(8,93)	(11,66)
Impor Relatif (Indeks)	100	140,10	159,22	175,31	40,10	13,65	10,10	19,87

Sumber: PDSI Kemendag, BPS, Hasil verifikasi KPPI, diolah.

43. Sebagaimana Tabel 4 di atas, periode 2021-2024 jumlah impor secara relatif terhadap produksi nasional mengalami peningkatan secara signifikan dengan tren sebesar 19,87%. Hal ini disebabkan karena di saat impor mengalami peningkatan, produksi IDN terus mengalami penurunan. Pada tahun 2021 impor relatif sebesar 100 poin indeks meningkat menjadi 140,10 poin indeks pada tahun 2022. Kemudian pada tahun 2023 impor relatif mengalami peningkatan kembali menjadi sebesar 159,22 poin indeks, kemudian pada tahun 2024 jumlah impor kembali meningkat menjadi 175,31 poin indeks.

C.2.3. Pangsa Pasar Negara Asal Impor

Tabel 5. Pangsa Pasar Negara Asal Impor

No. Urut	Negara Asal Impor	2024	
		Volume (Ton)	Pangsa (%)
1	Rep. Rakyat Tiongkok	17.006	82,40
2	Viet Nam	1.039	5,04
3	India	999	4,84
4	Hong Kong	638	3,09
5	Negara Lainnya	955	4,63
	Dunia	20.637	100

Sumber: PDSI Kemendag, BPS, diolah.

44. Sebagaimana pada Tabel 5 di atas, negara asal impor terbesar tahun 2024 adalah Rep. Rakyat Tiongkok (RRT) dengan pangsa 82,40%, diikuti oleh Viet Nam dengan pangsa 5,04%, India dengan pangsa 4,84%, Hong Kong dengan pangsa 3,09%, dan Negara lainnya (a.l. Korea Selatan, Pakistan, Taiwan, Thailand, dll), dengan pangsa pasar impor 4,63%.

C.2.4. Perkembangan Tidak Terduga (*Unforeseen Development*)

45. Terjadinya lonjakan jumlah impor dari negara asal impor Barang Yang Diselidiki tidak dapat diprediksi sebelumnya (*unforeseen development*). Hal ini diakibatkan oleh perang dagang AS-RRT, peningkatan produksi Kain Tenunan dari Kapas di India, dan peningkatan kapasitas produksi tekstil di Viet Nam yang tidak terduga sebelumnya.

46. Larangan Impor Amerika Serikat terhadap Produk Asal Uyghur RRT

Pada tanggal 21 Juni 2022 Amerika Serikat mengeluarkan kebijakan untuk pelarangan impor tekstil dari RRT khususnya dari provinsi Xinjiang apabila produk tersebut dibuat oleh tenaga kerja Uyghur di Xinjiang, RRT. Peraturan tersebut diatur dalam *section 2 of public law No. 117-78, An Act to ensure that goods made with forced labor in the Xinjiang Uyghur Autonomous Region of the People's Republic of China do not enter the United States America, and for other purpose (the Uyghur Forced Labor Prevention Act)*.

Dengan diberlakukannya peraturan di atas menyebabkan impor produk Kain Tenunan dari Kapas asal RRT di Amerika Serikat mengalami penurunan dengan tren sebesar 10,66% selama periode 2021 - 2024 sebagaimana Tabel 6 di bawah, sehingga RRT mengalihkan tujuan ekspor Kain Tenunan dari Kapas-nya ke negara lain, salah satunya ke Indonesia. Hal ini kemudian secara tidak terduga menyebabkan terjadinya lonjakan impor Kain Tenunan dari Kapas asal RRT di Indonesia.

Tabel 6. Data Ekspor Kain Tenunan dari Kapas RRT (Ton)

Negara Tujuan	Tahun				Perubahan (%)			Tren (%)
	2021	2022	2023	2024	2021 - 2022	2022 - 2023	2023 - 2024	2021 - 2024
Ekspor RRT ke AS	1.846	1.378	1.275	1.301	(25,35)	(7,47)	2,04	(10,66)
Ekspor RRT ke Indonesia	14.448	17.635	18.419	17.005	22,05	4,45	(7,68)	5,47

Sumber: Trade map dan BPS

47. Pembatasan Ekspor Bahan Baku Kapas Berdampak Terhadap Peningkatan Produksi Kain Tenunan dari Kapas di India

Pada tahun 2022, harga kapas dunia mengalami lonjakan yang tajam hampir 2 (dua) kali lipat dibandingkan tahun sebelumnya.¹ *Tiruppur Exporters Association* (TEA) selaku asosiasi eksportir kain kapas India meminta pemerintah India untuk melarang ekspor kapas guna memastikan ketersediaan bahan baku dan menstabilkan harga.²

Rencana pelarangan ekspor kapas oleh Pemerintah India mengakibatkan produksi Kain Tenunan dari Kapas meningkat sehingga ekspor Kain Tenunan dari Kapas India juga mengalami peningkatan ke seluruh dunia. Hal ini juga menyebabkan terjadinya lonjakan ekspor Kain Tenunan dari Kapas asal India ke Indonesia secara tidak terduga.

Tabel 7. Data Ekspor Produk Kain Tenunan dari Kapas India Periode 2021-2024 (Dalam Ton)

Negara	Tahun			
	2021	2022	2023	2024
Dunia	208.876	245.522	918.291	891.705
Indonesia	1.072	1.743	4.051	6.764

Sumber: Trade map

48. Peningkatan Kapasitas Produksi Tekstil di Vietnam yang Tidak Dapat Diduga Sebelumnya

Vietnam dikenal sebagai pusat produksi tekstil dengan model *Cut-Make-Trim* (CMT) atau model produksi berdasarkan pesanan. Pada tahun 2023, Industri tekstil Vietnam secara tidak terduga mengubah model produksi tekstilnya menjadi model *Original Design Manufacturing* (ODM) dan *Original Brand Manufacturing* (OBM)³. Perubahan strategi industri tekstil Vietnam ini menyebabkan peningkatan kapasitas produksi, teknologi, dan sumber daya

¹ *The Indian Express*, "Textile, Garment Industries Demand Cotton Exports Ban: Explained," 8 April 2022, <https://indianexpress.com/article/explained/textile-garment-industries-demand-cotton-exports-ban-explained-7928198/>

² *Tiruppur Exporters' Association (TEA)*, "TEA Urges Indian Govt to Ban Cotton Export to Stop Abnormal Price Rise," TEA India, 11 Januari 2022, <https://www.tea-india.org/news-board/16404-tea-urges-indian-govt-to-ban-cotton-export-to-stop-abnormal-price-rise-11th-january-2022>

³ "OBM, ODM modes considered for Vietnam's textile and production," *Vietnamnet*, accessed August 8, 2025, <https://vietnamnet.vn/en/obm-odm-modes-considered-for-vietnams-textile-and-production-E197972.html>.

manusia pada industri tekstil Vietnam. Dampak peningkatan tersebut menyebabkan peningkatan ekspor produk Kain Tenunan dari Kapas Vietnam secara masif ke seluruh dunia termasuk ke Indonesia.⁴

C.2.5. Efek obligasi GATT 1994

49. Berdasarkan *Article XIX of GATT 1994 "the effect of the obligations incurred"*, bahwa batas maksimum tarif konsesi Indonesia terhadap Barang Yang Diselidiki adalah 30% *ad valorem*. Selama periode penyelidikan, Indonesia telah mengurangi tarif produk impor di banyak sektor termasuk Kain Tenunan dari Kapas dengan rata-rata tarif *Most Favoured Nation* (MFN) yaitu 10%-20%. Dengan demikian, lonjakan impor adalah sebagai akibat dari dampak kewajiban WTO dan perkembangan tidak terduga sebagaimana telah dijelaskan pada poin 46-48.

C.3. Kerugian Serius / Ancaman Kerugian Serius

C.3.1. Kinerja Pemohon

50. Data kinerja Pemohon pada poin 51-53 diperoleh dari hasil analisa atas jawaban kuesioner dan verifikasi. Terdapat 6 (enam) indikator kinerja yang dianalisa yaitu **volume produksi, volume penjualan, produktivitas, kapasitas terpakai, laba/rugi, dan tenaga kerja.**

Penjualan Domestik dan Produksi

51. Selama periode 2021-2024, penjualan domestik mengalami tren penurunan sebesar 10,45%. Seiring dengan tren penurunan penjualan domestik, produksi Pemohon juga mengalami tren yang sama sebesar 10,21%. Hal ini disebabkan karena pada tahun 2024, Pemohon belum dapat meningkatkan produksi dan penjualan domestiknya sebagaimana pada tahun 2021 dikarenakan pasar domestik masih dibanjiri oleh barang impor, sebagaimana dapat dilihat pada Tabel 8 di bawah ini.

Tabel 8. Penjualan Domestik dan Produksi

Deskripsi	Satuan	Tahun				Perubahan (%)			Tren (%)
		2021	2022	2023	2024	2021-2022	2022-2023	2023-2024	2021-2024
Produksi	Indeks	100	93,09	81,98	72,86	(6,91)	(11,93)	(11,13)	(10,21)
Penjualan Domestik	Indeks	100	91,22	81,11	71,97	(8,78)	(11,08)	(11,27)	(10,45)

Sumber: Hasil Verifikasi KPPI

⁴ "Diversifying material sources opens door to sustainable supply chain," *VietnamPlus*, April 19, 2023, diakses 8 Agustus 2025, <https://en.vietnamplus.vn/diversifying-material-sources-opens-door-to-sustainable-supply-chain-post251793.vnp>.

Produksi dan Kapasitas Terpakai

52. Pada periode 2021-2024, jumlah produksi mengalami penurunan dengan tren 10,21% yang menyebabkan kapasitas terpakai juga mengalami penurunan dengan tren sebesar 10,31%, sebagaimana dapat dilihat pada Tabel 9 di bawah ini.

Tabel 9. Produksi dan Kapasitas Terpakai

Deskripsi	Satuan	Tahun				Perubahan (%)			Tren (%)
		2021	2022	2023	2024	2021-2022	2022-2023	2023-2024	2021-2024
Produksi	Indeks	100	93,09	81,98	72,86	(6,91)	(11,93)	(11,13)	(10,21)
Kapasitas Terpakai	Indeks	100	93,00	81,74	72,65	(7,00)	(12,11)	(11,12)	(10,31)

Sumber: Hasil Verifikasi KPPI

Produksi, Tenaga Kerja, Produktivitas, dan Keuntungan/Kerugian

53. Periode 2021-2024, tenaga kerja mengalami pengurangan dengan tren sebesar 6,62%. Penurunan tenaga kerja ini sejalan dengan turunnya produksi yang mengakibatkan terjadinya efisiensi biaya sehingga kerugian finansial yang dialami Pemohon turun setiap tahunnya dengan tren sebesar 58,17%.

Pada periode yang sama, produktivitas Pemohon mengalami tren penurunan sebesar 3,84%. Hal ini disebabkan karena penurunan tren volume produksi jauh lebih besar dibandingkan penurunan tren tenaga kerja, yaitu masing-masing sebesar 10,21% dan 6,62%, sebagaimana dapat dilihat pada Tabel 10 di bawah ini.

Tabel 10. Produksi, Tenaga Kerja, Produktivitas, dan Keuntungan/ Kerugian

Deskripsi	Satuan	Tahun				Perubahan (%)			Tren (%)
		2021	2022	2023	2024	2021-2022	2022-2023	2023-2024	2021-2024
Produksi	Indeks	100	93,09	81,98	72,86	(6,91)	(11,93)	(11,13)	(10,21)
Tenaga Kerja	Indeks	100	90,88	88,65	80,24	(9,12)	(2,45)	(9,49)	(6,62)
Produktivitas	Indeks	100	102,44	92,48	90,81	2,44	(9,72)	(1,81)	(3,84)
Keuntungan/ (Kerugian)	Indeks	(100)	(49,50)	(18,60)	(7,58)	(50,50)	(62,41)	(59,25)	(58,17)

Sumber: Hasil Verifikasi KPPI

54. Berdasarkan poin 51-53, dapat disimpulkan bahwa selama periode 2021-2024, Pemohon mengalami kerugian serius berdasarkan indikator kinerja yaitu tren penurunan produksi, penjualan domestik, produktivitas, kapasitas terpakai, tenaga kerja, dan terjadinya kerugian finansial.

C.3.2. Konsumsi Nasional dan Pangsa Pasar

Tabel 11. Konsumsi Nasional, Jumlah Impor, Penjualan Domestik IDN, Pangsa Pasar Impor, dan Pangsa Pasar IDN

Deskripsi	Satuan	Tahun				Perubahan (%)			Tren (%)
		2021	2022	2023	2024	2021-2022	2022-2023	2023-2024	2021-2024
1. Konsumsi Nasional	Indeks	100	97,67	88,73	81,09	(2,33)	(9,15)	(8,61)	(6,99)
2. Pangsa pasar Pemohon	Indeks	100	93,40	91,42	88,76	(6,60)	(2,12)	(2,92)	(3,72)
3. Pangsa pasar Non-Pemohon	Indeks	100	97,00	94,91	92,49	(3,00)	(2,16)	(2,55)	(2,53)
4. Pangsa Pasar Impor	Indeks	100	126,21	136,73	150,02	26,21	8,34	9,72	13,85

Sumber: BPS, API, Hasil Verifikasi KPPI, diolah.

55. Berdasarkan Tabel 11 di atas:

- Selama periode 2021-2024, konsumsi nasional mengalami penurunan dengan tren sebesar 6,99%, dan penurunan terbesar terjadi pada tahun 2023 sebesar 9,15% dibandingkan dengan tahun sebelumnya, yaitu dari 97,67 poin indeks menjadi 88,73 poin indeks.
- Sebagai dampak dari peningkatan pangsa pasar impor dengan tren sebesar 13,85% mengakibatkan penurunan pangsa pasar Pemohon dan Non-Pemohon masing-masing sebesar 3,72% dan 2,53%.

C.3.3. Faktor Lain

56. KPPI juga menganalisa faktor lain di luar lonjakan jumlah barang impor yang dapat mempengaruhi kerugian serius Pemohon sebagai berikut:

a) Teknologi

Berdasarkan hasil penyelidikan, Pemohon telah memiliki teknologi terkini dalam memproduksi Barang Yang Diselidiki. Hal ini didukung dengan fakta bahwa mesin Pemohon mampu memproduksi Barang Yang Diselidiki yang menghasilkan berbagai macam kain dengan teknologi terkini, mesin pencelupan kain warna, dan mesin cetak motif batik maupun motif lainnya. Hal ini menunjukkan bahwa kerugian serius Pemohon bukan disebabkan karena faktor teknologi.

b) Kualitas

Kualitas barang yang diproduksi Pemohon telah memenuhi standar yang ditetapkan secara nasional dan internasional, dengan adanya sertifikat seperti **SNI** (0560:2008, 08-1793-1990, 0276:2009, 0562:2009) dan **OEKO-TEX** (sertifikat internasional untuk keamanan produk tekstil dari bahan kimia berbahaya/ zat beracun). Dengan demikian, barang yang diproduksi Pemohon dalam segi kualitas sudah mampu bersaing dengan barang impor karena sesuai dengan standar dalam negeri maupun luar negeri.

c) Kapasitas Terpasang Nasional

Tabel 12. Perbandingan Kapasitas Terpasang dan Konsumsi Nasional

Deskripsi	Satuan	2021	2022	2023	2024
Konsumsi Nasional terhadap Kapasitas Terpasang Nasional	%	37,1	40,2	41,2	48,5

Sumber: Hasil Verifikasi KPPI, diolah.

57. Sebagaimana terlihat pada Tabel 12 di atas, selama periode 2021-2024 konsumsi nasional tidak pernah melebihi kapasitas terpasang nasional, sehingga konsumsi nasional dapat dipenuhi oleh Industri Dalam Negeri.
58. Sebagaimana telah dijelaskan pada poin 56, tidak ada faktor lain yang memberikan kontribusi terhadap kerugian serius yang dialami oleh Pemohon selain lonjakan jumlah impor Barang Yang Diselidiki.

C.4. Hubungan Sebab-Akibat

59. Selama periode 2021-2024 dapat disimpulkan bahwa terbukti adanya kerugian serius yang dialami oleh Pemohon disebabkan oleh lonjakan jumlah impor Barang Yang Diselidiki dan bukan disebabkan oleh faktor lain, yang didasarkan pada beberapa bukti, yaitu:
 - a) Terjadi lonjakan jumlah impor Barang Yang Diselidiki secara absolut dengan tren sebesar 5,89%, sedangkan lonjakan jumlah impor Barang Yang Diselidiki secara relatif dengan tren sebesar 19,87%.
 - b) Pangsa pasar impor mengalami peningkatan dengan tren sebesar 13,85%, namun pangsa pasar Pemohon mengalami penurunan dengan tren sebesar 3,27%.
 - c) Terjadinya tren penurunan produksi, penjualan domestik, produktivitas, kapasitas terpakai, tenaga kerja, dan terjadi kerugian finansial.
 - d) Sesuai penjelasan pada poin 56, tidak ada faktor lain yang menyebabkan kerugian serius yang dialami Pemohon selain lonjakan jumlah impor Barang Yang Diselidiki.

D. REKOMENDASI

60. Berdasarkan hasil penyelidikan (bagian C), KPPI merekomendasikan pengenaan BMTP dalam bentuk tarif spesifik terhadap impor produk Kain Tenunan dari Kapas pada 25 (dua puluh lima) No. HS 8-digit sesuai BTKI tahun 2022 adalah sebagai berikut:

Tabel 13. Rekomendasi Pengenaan BMTP

No	No. HS	Satuan	BMTP (<i>Specific Duty</i>)		
			Tahun I	Tahun II	Tahun III
1	5208.21.00	Rp/ Meter	9.577	9.013	8.482
2	5208.22.00	Rp/ Meter	9.467	8.909	8.384
3	5208.31.90	Rp/ Meter	9.610	9.044	8.511
4	5208.33.00	Rp/ Meter	9.415	8.860	8.338
5	5208.51.10	Rp/ Meter	10.585	9.962	9.375
6	5208.52.10	Rp/ Meter	14.702	13.836	13.021
7	5209.11.90	Rp/ Meter	10.624	9.998	9.409
8	5209.21.00	Rp/ Meter	9.646	9.077	8.543
9	5209.31.00	Rp/ Meter	9.338	8.788	8.271
10	5209.49.00	Rp/ Meter	9.228	8.685	8.173
11	5209.51.10	Rp/ Meter	16.974	15.974	15.033
12	5209.59.10	Rp/ Meter	16.740	15.754	14.827
13	5210.21.00	Rp/ Meter	8.785	8.268	7.781
14	5210.32.00	Rp/ Meter	9.501	8.942	8.415
15	5210.51.10	Rp/ Meter	20.675	19.457	18.311
16	5210.59.10	Rp/ Meter	21.144	19.898	18.726
17	5210.59.90	Rp/ Meter	10.887	10.246	9.643
18	5211.31.00	Rp/ Meter	9.467	8.910	8.385
19	5211.59.10	Rp/ Meter	18.590	17.495	16.464
20	5211.59.90	Rp/ Meter	12.668	11.922	11.220
21	5212.15.10	Rp/ Meter	14.042	13.215	12.437
22	5212.15.90	Rp/ Meter	13.127	12.354	11.627
23	5212.21.00	Rp/ Meter	9.639	9.071	8.537
24	5212.23.00	Rp/ Meter	10.750	10.117	9.521
25	5212.25.10	Rp/ Meter	13.966	13.143	12.369

61. Besaran pengenaan BMTP untuk masing-masing No. HS. disesuaikan dengan harga jual masing-masing No. HS dalam satuan Meter. Besaran BMTP terbesar yaitu No. HS. **5210.59.10** sebesar Rp. 21.144/ meter pada tahun I yaitu **Kain yang dicetak dengan proses batik tradisional**, sedangkan Besaran BMTP terkecil yaitu No. HS. **5210.21.00** sebesar Rp. 8.785/ meter pada tahun I yaitu **Kain tenunan polos (*greige*)**.

62. Sesuai ketentuan Pasal 90 PP 34/2011 dan pasal 9.1 *WTO Agreement on Safeguards*, BMTP dikenakan terhadap produk yang berasal dari semua negara, kecuali negara berkembang yang pangsa impornya tidak melebihi 3% (tiga persen), atau secara kumulatif tidak melebihi 9% (sembilan persen) dari total impor sepanjang masing-masing negara berkembang mempunyai pangsa impor kurang dari 3% (tiga persen).

Tabel 14. Daftar Negara Anggota WTO yang Dikecualikan BMTP

No.	Negara	No.	Negara
1	Afghanistan	36	El Salvador
2	Albania	37	Eswatini
3	Angola	38	Fiji
4	Antigua and Barbuda	39	Gabon
5	Argentina	40	Gambia, The
6	Armenia	41	Georgia
7	Bahrain, Kingdom of	42	Ghana
8	Bangladesh	43	Grenada
9	Barbados	44	Guatemala
10	Belize	45	Guinea
11	Benin	46	Guinea-Bissau
12	Bolivia, Plurinational State of	47	Guyana
13	Botswana	48	Haiti
14	Brazil	49	Honduras
15	Brunei Darussalam	50	Israel
16	Burkina Faso	51	Jamaica
17	Burundi	52	Jordan
18	Cabo Verde	53	Kazakhstan
19	Cambodia	54	Kenya
20	Cameroon	55	Korea, Republic of
21	Central African Republic	56	Kuwait, the State of
22	Chad	57	Kyrgyz Republic
23	Chile	58	Lao People's Democratic Republic
24	Colombia	59	Lesotho
25	Comoros	60	Liberia
26	Congo	61	Macao, China
27	Costa Rica	62	Madagascar
28	Cote d'Ivoire	63	Malawi
29	Cuba	64	Malaysia
30	Democratic Republic of the Congo	65	Maldives
31	Djibouti	66	Mali
32	Dominica	67	Mauritania
33	Dominican Republic	68	Mauritius
34	Ecuador	69	Mexico
35	Egypt	70	Moldova, Republic of

No.	Negara	No.	Negara
71	Mongolia	97	Seychelles
72	Montenegro	98	Sierra Leone
73	Morocco	99	Singapore
74	Mozambique	100	Solomon Islands
75	Myanmar	101	South Africa
76	Namibia	102	Sri Lanka
77	Nepal	103	Suriname
78	Nicaragua	104	Taipei, Chinese
79	Niger	105	Tajikistan
80	Nigeria	106	Tanzania
81	North Macedonia	107	Thailand
82	Oman	108	Timor-Leste
83	Pakistan	109	Togo
84	Panama	110	Tonga
85	Papua New Guinea	111	Trinidad and Tobago
86	Paraguay	112	Tunisia
87	Peru	113	Türkiye
88	Philippines	114	Uganda
89	Qatar	115	Ukraine
90	Rwanda	116	United Arab Emirates
91	Saint Kitts and Nevis	117	Uruguay
92	Saint Lucia	118	Vanuatu
93	Saint Vincent and the Grenadines	119	Venezuela, Bolivarian Republic of
94	Samoa	120	Yemen
95	Saudi Arabia, Kingdom of	121	Zambia
96	Senegal	122	Zimbabwe

Sumber: <https://www.tfadatabase.org/en/groupings/lcds-developing-members>

E. PENYESUAIAN STRUKTURAL

63. Selama Pengenaan Bea Masuk Tindakan Pengamanan (BMTP) Pemohon berkewajiban melakukan penyesuaian struktural, berdasarkan ketentuan Pasal 86 ayat (1) PP No. 34/2011 dan *Article 7.1 WTO AoS*.
64. KPPI telah melaksanakan **rapat koordinasi** tanggal **1 Juli 2025** di kantor API, Bandung, Jawa Barat dengan **Direktorat Industri Tekstil, Kulit dan Alas Kaki (ITKAK)** serta **Asosiasi Pertekstilan Indonesia (API)** dalam rangka pembahasan terkait rencana program penyesuaian struktural yang akan dilakukan oleh Pemohon.
65. Berdasarkan poin 64, disepakati bahwa penyesuaian struktural yang akan dilakukan Pemohon sebagai berikut:

Tabel 15. Rencana Program Penyesuaian Struktural Pemohon

No	Rencana Program	Rencana Kegiatan	Satuan	Tahun Pertama	Tahun Kedua	Tahun Ketiga
1	Efisiensi Produksi	a. Optimalisasi produksi melalui efisiensi proses produksi;	Indeks	100	167	233
		b. Optimalisasi pemakaian bahan baku kain (<i>grey, finishing</i> , dsb);	Indeks	100	200	250
		c. Diversifikasi Penambahan jenis produk kain (motif, tekstur, <i>finishing</i> khusus, dsb);	Indeks	100	200	300
2	Produktivitas Tenaga Kerja	a. Pelatihan berkala;	Indeks	100	200	300
		b. Penambahan jumlah karyawan yang mengikuti pelatihan peningkatan produktivitas dan <i>lean manufacturing</i> ;	Indeks	100	167	267
3	Kualitas Produk	a. Penurunan tingkat cacat kain (misal cacat anyaman, warna, <i>printing</i>);	Indeks	100	200	300
		b. Sertifikasi mutu dan uji laboratorium untuk kain (warna, luntur, kekuatan);	Indeks	100	200	300
4	Perubahan Teknologi	a. Investasi mesin untuk meningkatkan produktivitas (Per sektor);	Indeks	100	233	400
		b. Investasi teknologi digital untuk kontrol mutu kain dan efisiensi penggunaan energi/air;	Indeks	100	200	300
5	Strategi Purna Produksi	a. Perluasan pasar ekspor & domestik untuk kain kapas (negara / wilayah tujuan baru);	Indeks	100	200	300
		b. Penguatan <i>branding</i> dan <i>digital marketing</i> untuk meningkatkan permintaan dari <i>buyer</i> luar negeri dan domestik;	Indeks	100	200	300

Sumber: Asosiasi Pertekstilan Indonesia (API)

66. Penjelasan program penyesuaian struktural yang akan dilakukan oleh Pemohon sebagai berikut:

1) **Efisiensi Produksi**

Kegiatan efisiensi produksi dilakukan melalui optimalisasi proses produksi dan efisiensi penggunaan bahan baku, serta diversifikasi produk untuk memenuhi kebutuhan pasar yang beragam.

- Peningkatan efisiensi produksi** sebesar 100 poin indeks di tahun I, 167 poin indeks di tahun II, dan 233 poin indeks di tahun III.
- Peningkatan efisiensi pemakaian bahan baku** sebesar 100 poin indeks di tahun I, 200 poin indeks di tahun II, dan 250 poin indeks di tahun III.
- Penambahan jenis produk kain** sebanyak 100 poin indeks jenis kain pada tahun I, 200 poin indeks jenis kain pada tahun II, dan 300 poin indeks jenis kain pada tahun III.

2) **Produktivitas Tenaga Kerja**

Kegiatan produktivitas tenaga kerja dilakukan melalui pelatihan berkala untuk meningkatkan keterampilan teknis dan keterampilan manajerial. Disamping itu, Pemohon/ API akan menambah jumlah karyawan yang mengikuti program pelatihan.

- a. **Pelatihan berkala** dilaksanakan sebanyak 100 poin indeks angkatan pada tahun I, 200 poin indeks angkatan pada tahun II, dan 300 poin indeks angkatan pada tahun III.
- b. **Penambahan jumlah karyawan peserta pelatihan** masing-masing 100 poin indeks orang di tahun I, 167 poin indeks orang di tahun II, dan 267 poin indeks orang di tahun III.

3) **Kualitas Produk**

Upaya peningkatan kualitas produk dilakukan melalui pengurangan tingkat kecacatan produk dan penambahan sertifikasi mutu/ kualitas produk.

- a. **Mengurangi tingkat kecacatan** sebesar 100 poin indeks di tahun I, 200 poin indeks di tahun II, dan 300 poin indeks di tahun III.
- b. **Memperoleh sertifikasi mutu/ kualitas produk** sebanyak 100 poin indeks di tahun I, 200 poin indeks di tahun II, dan 300 poin indeks di tahun III.

4) **Perubahan Teknologi**

Pemohon/ API akan melakukan perubahan teknologi dengan cara mendorong penggunaan mesin berteknologi otomasi, perangkat lunak, dan digitalisasi, serta melakukan investasi berkelanjutan dengan menggunakan mesin dan teknologi modern.

- a. **Target investasi mesin** per sektor senilai 100 poin indeks unit pada tahun I, 233 poin indeks unit pada tahun II, dan 400 poin indeks unit pada tahun III.
- b. **Penambahan teknologi digital** masing-masing sebanyak 100 poin indeks di tahun I, 200 poin indeks di tahun II, dan 300 poin indeks di tahun III.

5) **Strategi Purna Produksi**

Strategi purna produksi yang akan dilakukan Pemohon/ API melalui perluasan target pasar dalam negeri dan luar negeri serta intensifikasi pemasaran digital guna menjangkau pelanggan baru.

- a. **Perluasan target pasar** dalam negeri dan luar negeri sebesar 100 poin indeks di tahun I, 200 poin indeks di tahun II, dan 300 poin indeks di tahun III.
- b. **Penguatan *branding* dan *digital marketing***
Penguatan *branding* dan *digital marketing* dilaksanakan untuk mendapatkan masing-masing sebanyak 100 poin indeks pelanggan baru pada tahun I, 200 poin indeks pada tahun II, dan 300 poin indeks pada tahun III.

Lampiran 1

Daftar Produsen yang Diwakili Pemohon

No	Nama Perusahaan	Alamat
1.	PT. Delta Merlin Dunia Tekstil	Pd. III, Pondok, Kec. Grogol, Kabupaten Sukoharjo, Jawa Tengah 57552, Indonesia
2.	PT. Dunia Setia Sandang Asli Tekstil	Jl. H. Fachrudin No.36, RT.9/RW.5, Petamburan, Kecamatan Tanah Abang, Kota Jakarta Pusat, Daerah Khusus Ibukota Jakarta 10250
3.	PT. Damaitek	Jl. Simongan No.100, Ngemplak Simongan, Kec. Semarang Barat, Kota Semarang, Jawa Tengah 50148
4.	PT. Sri Rejeki Isman	Jl. KH. Samanhudi 88, Jetis, Sukoharjo, Solo – Central Java, Indonesia
5.	PT. Sari Warna Asli	Jl. HOS Cokroaminoto no. 28 Pucang Sawit, Surakarta, Jawa Tengah. Indonesia 57125
6.	PT. Djohartex	Jl. Raya Magelang - Purworejo, Km 9, Kabupaten Magelang
7.	PT. Senang Kharisma	Jalan Solo - Sragen No.KM 7,8, Silamat, Kabupaten Karanganyar
8.	PT. Kosoema Nanda Putra	Jl. Karangdowo KM. 3, Jatimulyo, Pedan, Klaten 57468
9.	PT. Agung Sejahtera Sidoraharjatex	Jl.Raya Palur Sragen KM.9, Jaten, Kab Karanganyar, Jawa Tengah

Sumber: Pemohon, diolah

Lampiran 2

Uraian 25 (Dua Puluh Lima) No. HS 8-Digit yang Direkomendasikan BMTF

NO	NO. HS	URAIAN BARANG	DESCRIPTION OF GOODS
	52.08	Kain tenunan dari kapas, mengandung kapas 85 % atau lebih menurut beratnya, beratnya tidak lebih dari 200 g/m ² .	<i>Woven fabrics of cotton, containing 85 % or more by weight of cotton, weighing not more than 200 g/m².</i>
		- Dikelantang:	- <i>Bleached:</i>
1	5208.21.00	- - Tenunan polos, beratnya tidak lebih dari 100 g/m ²	- - <i>Plain weave, weighing not more than 100 g/m²</i>
2	5208.22.00	- - Tenunan polos, beratnya lebih dari 100 g/m ²	- - <i>Plain weave, weighing more than 100 g/m²</i>
		- Dicelup:	- <i>Dyed:</i>
	5208.31	- - Tenunan polos, beratnya tidak lebih dari 100 g/m ² :	- - <i>Plain weave, weighing not more than 100 g/m²:</i>
3	5208.31.90	- - - Lain-lain	- - - <i>Other</i>
4	5208.33.00	- - Kepar 3-benang atau 4-benang, termasuk kepar silang	- - <i>3-thread or 4-thread twill, including cross twill</i>
		- Dicitak:	- <i>Printed:</i>
	5208.51	- - Tenunan polos, beratnya tidak lebih dari 100 g/m ² :	- - <i>Plain weave, weighing not more than 100 g/m²:</i>
5	5208.51.10	- - - Dicitak dengan proses batik tradisional	- - - <i>Printed by the traditional batik process</i>
	5208.52	- - Tenunan polos, beratnya lebih dari 100 g/m ² :	- - <i>Plain weave, weighing more than 100 g/m²:</i>
6	5208.52.10	- - - Dicitak dengan proses batik tradisional	- - - <i>Printed by the traditional batik process</i>
	52.09	Kain tenunan dari kapas, mengandung kapas 85 % atau lebih menurut beratnya, beratnya lebih dari 200 g/m ² .	<i>Woven fabrics of cotton, containing 85 % or more by weight of cotton, weighing more than 200 g/m².</i>
		- Tidak dikelantang:	- <i>Unbleached:</i>
	5209.11	- - Tenunan polos:	- - <i>Plain weave:</i>
7	5209.11.90	- - - Lain-lain	- - - <i>Other</i>
		- Dikelantang:	- <i>Bleached:</i>
8	5209.21.00	- - Tenunan polos	- - <i>Plain weave</i>
		- Dicelup:	- <i>Dyed:</i>
9	5209.31.00	- - Tenunan polos	- - <i>Plain weave</i>
		- Dari benang aneka warna:	- <i>Of yarns of different colours:</i>
10	5209.49.00	- - Kain lainnya	- - <i>Other fabrics</i>
		- Dicitak:	- <i>Printed:</i>
	5209.51	- - Tenunan polos:	- - <i>Plain weave:</i>
11	5209.51.10	- - - Dicitak dengan proses batik tradisional	- - - <i>Printed by the traditional batik process</i>
	5209.59	- - Kain lainnya:	- - <i>Other fabrics:</i>
12	5209.59.10	- - - Dicitak dengan proses batik tradisional	- - - <i>Printed by the traditional batik process</i>
	52.10	Kain tenunan dari kapas,	<i>Woven fabrics of cotton,</i>

NO	NO. HS	URAIAN BARANG	DESCRIPTION OF GOODS
		mengandung kapas kurang dari 85 % menurut beratnya, dicampur terutama atau semata-mata dengan serat buatan, beratnya tidak lebih dari 200 g/m2.	<i>containing less than 85 % by weight of cotton, mixed mainly or solely with man-made fibres, weighing not more than 200 g/m2.</i>
		- Dikelantang:	- <i>Bleached:</i>
13	5210.21.00	- - Tenunan polos	- - Plain weave
		- Dicelup:	- <i>Dyed:</i>
14	5210.32.00	- - Kepar 3-benang atau 4-benang, termasuk kepar silang	- - 3-thread or 4-thread twill, including cross twill
		- Dicetak:	- <i>Printed:</i>
	5210.51	- - Tenunan polos:	- - <i>Plain weave:</i>
15	5210.51.10	- - - Dicetak dengan proses batik tradisional	- - - Printed by the traditional batik process
	5210.59	- - Kain lainnya:	- - <i>Other fabrics:</i>
16	5210.59.10	- - - Dicetak dengan proses batik tradisional	- - - Printed by the traditional batik process
17	5210.59.90	- - - Lain-lain	- - - Other
	52.11	Kain tenunan dari kapas, mengandung kapas kurang dari 85 % menurut beratnya, dicampur terutama atau semata-mata dengan serat buatan, beratnya lebih dari 200 g/m2.	<i>Woven fabrics of cotton, containing less than 85 % by weight of cotton, mixed mainly or solely with man-made fibres, weighing more than 200 g/m2.</i>
		- Dicelup:	- <i>Dyed:</i>
18	5211.31.00	- - Tenunan polos	- - Plain weave
		- Dicetak:	- <i>Printed:</i>
	5211.59	- - Kain lainnya:	- - <i>Other fabrics:</i>
19	5211.59.10	- - - Dicetak dengan proses batik tradisional	- - - Printed by the traditional batik process
20	5211.59.90	- - - Lain-lain	- - - Other
	52.12	Kain tenunan lainnya dari kapas.	<i>Other woven fabrics of cotton.</i>
		- Beratnya tidak lebih dari 200 g/m2 :	- <i>Weighing not more than 200 g/m2:</i>
	5212.15	- - Dicetak:	- - <i>Printed:</i>
21	5212.15.10	- - - Dicetak dengan proses batik tradisional	- - - Printed by the traditional batik process
22	5212.15.90	- - - Lain-lain	- - - Other
		- Beratnya lebih dari 200 g/m2 :	- <i>Weighing more than 200 g/m2:</i>
23	5212.21.00	- - Tidak dikelantang	- - Unbleached
24	5212.23.00	- - Dicelup	- - Dyed
	5212.25	- - Dicetak:	- - <i>Printed:</i>
25	5212.25.10	- - - Dicetak dengan proses batik tradisional	- - - Printed by the traditional batik process

Sumber: Buku Tarif Kepabeanan Indonesia (BTKI) 2022

DOKUMENTASI

A. Public Hearing (Dengar Pendapat)



B. Kunjungan Verifikasi





C. Rapat Koordinasi dengan K/L Teknis dan Pemohon



D. Rapat Koordinasi Dengan K/L Teknis



**FINAL REPORT OF INVESTIGATION RESULTS
TRADE SAFEGUARD MEASURES
ON IMPORTED COTTON WOVEN FABRIC**

**25 8-Digit HS Numbers Based on the 2022 Indonesian Customs
Tariff Book**

UNSECRET VERSION

INDONESIAN TRADE SECURITY COMMITTEE (KPPI) 2025

EXECUTIVE SUMMARY

1. **Woven fabric** made from cotton yarn is a raw material for making clothing and clothing accessories, for example scarves, socks, towels, *bed sheets* and other products.

2. **The applicant is the Indonesian Textile Association (API)** which represents 9 companies with a production proportion of **55.2%**, consisting of:

(1) PT. Delta Merlin Dunia Tekstil (2) PT. Dunia Setia Sandang Asli Tekstil (3) PT. Damaitek

(4) PT. Sari Warna Asli

(5) PT. Djohartex

(6) PT. Senang Kharisma

(7) PT. Kosoema Nanda Putra

(8) PT. Agung Sejahtera Sidoraharjatex

(9) PT. Sri Rejeki Isman

3. From the results of the KPPI investigation in 2021 – 2024, there has been **a surge in absolute and relative import volumes** in imports of Woven Fabrics from Cotton with a trend of 5.89% and 19.87% which caused serious losses to IDN as seen from the downward trend:

(1) Production -10.21%

(2) Domestic Sales -10.45%

(3) Productivity -3.84%

(4) Capacity Utilization -10.31% (5)

Workforce -6.62%

(6) Financial loss -58.17%.

There is a causal relationship that there is a surge in the number of imports that causing serious harm and there are no other factors that causing serious harm to the Applicant.

4. The surge in imports, especially in 2024, was dominated by **the People's Republic of China (82.40%), Vietnam (5.04%), India (4.84%), and Hong Kong (3.09%).**

Unforeseen Development. This is due to the US-China trade war, increased production of woven cotton fabrics in India, and increased textile production capacity in Vietnam.

5. KPPI recommends the imposition of **Safeguard Import Duty (BMTP)** for **3 (three) years** on imports of **"Woven Fabric from "Cotton"** which consists of **25 8-digit HS No.**, namely:

Period	BMTP <i>Specific Duty</i>
Year I	Rp. 8,785/m to Rp. 21,144/m
Year II	Rp. 8,268/m to Rp. 19,898/m
Year III	Rp. 7,781 /m to Rp. 18,726 /m

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FOREWORD

We express our gratitude to the presence of Almighty God who has given His grace and guidance, so that the Indonesian Trade Safeguard Committee (KPPI) can complete the investigation into the imposition of Trade Safeguard Measures (TPP) on imported Cotton Woven Fabrics in the context of recovery and prevention of losses/threats of serious losses experienced by the Domestic Industry (IDN) due to the surge in the number of imported goods, as mandated in the provisions of Article 95 paragraph (1) of Government Regulation No. 34 of 2011 concerning Antidumping Measures, Countervailing Measures, and Trade Security Measures (PP 34 of 2011).

The aim of the investigation is to prove that the serious losses/threat of serious losses experienced by IDN are the result of a surge in the number of imported goods as regulated in the provisions of Article 70 paragraph (1) of PP 34 of 2011.

Special thanks are extended to Mr. Dr. Budi Susanto, M.Si. as Minister of Trade for the support given to KPPI in conducting the investigation, and also to the Ministries/Institutions, IDN, and other interested parties for the support provided during the investigation.

Finally, we hope that the Final Report of the investigation into the imposition of Safeguard Measures on imported Woven Cotton Fabrics will be useful for other interested parties, especially in providing protection to the Indonesian Domestic Industry (IDN).

Jakarta, September 2025

Julia Gustaria Silalahi
Chairman of KPPI

A. INTRODUCTION

A.1. Background

1. On September 18, 2023, the Indonesian Trade Safeguard Committee (KPPI) received an Application from the Indonesian Textile Association (API), hereinafter referred to as the Applicant, to conduct an investigation in order to impose Trade Safeguard Measures (TPP) on the import of goods "Woven Fabric from Cotton" with **33 (thirty-three)** 8-digit *Harmonized System* (HS) No. , in accordance with the 2022 Indonesian Customs Tariff Book (BTKI), namely HS No.

5208.21.00, 5208.22.00, 5208.31.90, 5208.33.00, 5208.41.90, 5208.42.10, 5208.42.90, 5208.43.00, 5208.52.10, 5208.59.20, 5208.59.90, 5209.11.10, 5209.11.90, 5209.19.00, 5209.21.00, 5209.31.00, 5209.49.00, 5209.51.10, 5210.21.00, 5210.32.00, 5210.41.10, 5210.49.00, 5210.51.10, 5210.59.10, 5210.59.90, 5211.31.00, 5211.32.00, 5211.39.00, 5211.59.10, 5211.59.90, 5212.15.90, 5212.21.00, 5212.23.00.

2. In accordance with Government Regulation Number 34 of 2011 (PP 34/2011) concerning Antidumping Measures, Countervailing Measures, and Trade Safeguard Measures, KPPI conducted research on the initial evidence of the investigation application in the context of imposing TPP on imports of Woven Fabrics from Cotton. From the results of the analysis of the initial evidence, there was a surge in the number of imports of the goods in question during the period 2019-2022, as well as Serious Losses or Threats of Serious Losses experienced by the Applicant due to the surge in the number of imports of the goods in question.
3. In connection with this matter, based on letter **No. PI.02/147/KPPI/10/2023 dated October 16, 2024, KPPI decided received the application and determined the commencement of the TPP investigation into the import of Woven Fabrics from Cotton on October 27, 2023**, which was immediately announced through the Bisnis Indonesia newspaper and the Ministry of Trade *website* on the same day.
4. Furthermore, on **July 1, 2025**, KPPI received a re-application from the Applicant regarding the addition of **4 (four)** 8-digit HS No. to be investigated. namely HS No. **5208.51.10, 5209.59.10, 5212.15.10, and 5212.25.10.**
5. Of the total of **37 (thirty seven)** 8-digit HS Nos. submitted by the Applicant, there are **12 (twelve)** 8-digit HS Nos. which are not similar goods or goods which directly compete with each other which cause serious harm or threat of serious harm.

Applicant, namely No. HS.

5208.41.90, 5208.42.10, 5208.42.90, 5208.43.00, 5208.59.20, 5208.59.90, 5209.11.10, 5209.19.00, 5210.41.10, 5210.49.00, 5211.32.00, 5211.39.00.

Thus, the 12 HS Nos. were excluded from the scope of the goods investigated, so that the total number of HS Nos. investigated became **25 (twenty-five) 8-digit HS Nos.** according to BTKI 2022, namely HS Nos.

5208.21.00, 5208.22.00, 5208.31.90, 5208.33.00, 5208.51.10, 5208.52.10, 5209.11.90, 5209.21.00, 5209.31.00, 5209.49.00, 5209.51.10, 5209.59.10, 5210.21.00, 5210.32.00, 5210.51.10, 5210.59.10, 5210.59.90, 5211.31.00, 5211.59.10, 5211.59.90, 5212.15.10, 5212.15.90, 5212.21.00, 5212.23.00, 5212.25.10,

Change in number of HS No. from application to investigation can be seen in the table below.

Table 1. Number of No. HS 8-digit Initial Application, Additional Applications Dismissed from Investigation, and Those Under Investigation

HS No. Initial Application	HS No. Additional Application	No. HS Excluded from Investigation	HS No. Investigated
33 No. HS	4 HS No.	12 HS No.	25 HS No.

A.2. Applicant's Identity

6. The applicant's identity is as follows:

Name : Indonesian Textile Association
 Address : Graha Surveyor Indonesia, 16th Floor, Jl.
 Jend. Gatot Subroto Kav. 56, South Jakarta
 Tel./Fax : (021) 5272171 / 021-5272166
 Email : secretariat@bpnapi.org
 Contact Person : Andrew Purnama
 Position: Secretary General of API

The list of companies represented by the applicant in the investigation is as in **Attachment 1**.

A.3. Large Proportion

7. In accordance with Article 1 Number 18 of PP 34/2011, the Applicant's cumulative production proportion is a large proportion of 55.2% of the total national production in 2024, so the Applicant has fulfilled the requirements to represent IDN, as shown in Table 2 below.

Table 2. Production Proportion in 2024

Description	Proportion (%)
Applicant's Production	55.2
Non-Applicant Production	44.8
National Production	100

Source: Applicant and Verification Results

8. Based on Table 2, the Applicant's production proportion is 55.2% and the Non-Applicant's production proportion is 44.8% of the total national production. Thus, the Applicant is declared to have fulfilled the *Major Proportion* requirements according to *Article 4.1(c) of the Agreement on Safeguards* (AoS) and Article 1 number 18 of PP 34/2011 to represent IDN.

A.4. Investigation Period

9. At the time of initiation, the investigation was conducted in the 2020-2022 period and then KPPI updated the data to the 2021-2024 period to obtain the most *recent data*.

A.5. Procedures and Notifications

10. In accordance with Article 74 Paragraph (2) of PP 34/2011, on October 27 2023, KPPI will provide written notification of the commencement of the investigation to the Applicant and other Interested Parties (PYB).
The notice was published in the **Bisnis Indonesia** newspaper and a press release on the Ministry of Trade *website*.
11. In accordance with *Article 12.1(a) of the WTO Agreement on Safeguards (AoS)*, on **October 27, 2023**, the Indonesian Government sent a *Notification of Article 12.1(a) to the Committee on Safeguards* at the WTO regarding the commencement of an investigation and on **November 1, 2023**, the notification was circulated by the WTO with document number G/SG/N/6/IDN/40.
12. In accordance with Article 79 Paragraph (1) of PP 34/2011 and *Article 3 WTO AoS*, on **November 29, 2023**, KPPI held a **public hearing** to provide an opportunity for PYB to present evidence, views and responses to the commencement of the TPP investigation into the import of Woven Cotton Fabrics. The hearing was attended by representatives from the Government of the exporting country (Embassy of the People's Republic of China, Embassy of Mexico, Embassy of Thailand, and Embassy of India), exporter association (*China Chamber of Commerce for Import & Export of Textile/ (CCCT)*), related Ministries/Institutions (Indonesian National Development Planning Agency (BAPPENAS), Director of the Textile Leather and Footwear Industry, Ministry of Industry, Director of Industrial Resilience and Business Climate, Ministry of Industry, and KPPU) as well as the IDN association and the Applicant (API, PT. Sari Warna Asli Tekstil Industry and PT. Sri Rejeki Isman).
13. In accordance with Article 78 Paragraph (1) letter a PP 34/2011, dated **19 January 2024**
KPPI requested a written explanation in the form of a questionnaire from the company represented by the Applicant (**Attachment 2**) and the questionnaire answers were returned to KPPI on **June 6, 2024**, accompanied by supporting evidence.
14. In order to check the accuracy of the data and information statements, on **June 11-14 2024**, KPPI conducted field verification of the Applicant's company.
15. In accordance with Article 78 Paragraph (1) letter a of PP 34/2011, dated **July 5 2024**, KPPI requested a written explanation in the form of a questionnaire from the Applicant (API) regarding the consolidation of company data and national data.

Furthermore, on **October 1, 2024**, API returned the Questionnaire Answers to KPPI.

16. In accordance with Article 78 Paragraph (1) letter a PP 34/2011, dated **17 January 2025** KPPI requests **data updates** for the period under investigation (2021-2024) in writing in the form of a questionnaire to the Applicant and has been returned to KPPI on **February 21, 2025**.
17. In accordance with *Article 12.1(a)* in the WTO AoS, on **July 15, 2025**, the Government of the Republic of Indonesia sent a Notification of *Article 12.1(a) supplement to the Committee on Safeguards* at the WTO regarding the addition of 4 (four) 8-digit HS No. namely HS. 5208.51.10, 5209.59.10, 5212.15.10, and 5212.25.10. The notification was circulated by the WTO on **July 16, 2025** with document number G/SG/N/6/IDN/40/Suppl.1.

B. STATEMENT OF THE INTERESTED PARTIES

B.1. Hearing (*Public Hearing*)

18. The public hearing was held on **November 29, 2023**.
in the Orchid Room, 12th Floor, Ministry of Trade. The evidence, views, and responses/statements submitted in writing at the hearing are:

B.1.1. Embassy of Mexico

Statement:

19. Based on *Trade Map* site data for the period 1 January 2020 to As of December 31, 2022, there are no exports of woven cotton products from Mexico to Indonesia. Therefore, in accordance with *Article 9.1* of the AoS, as a developing country with an import share below 3%, Mexico should be exempt from the imposition of *safeguards*.

KPPI's response to the statement from the Mexican Embassy:

20. The answer to point 19 is in accordance with the results of the KPPI investigation, it is known that in 2024 the share of imports of Woven Cotton Fabrics from Mexico is less than 3%, so in accordance with the provisions of *Article 9* AoS, Mexico as a developing country is exempt from the imposition of *safeguards*.

B.1.2. Directorate General of Import, Ministry of Trade, Republic of Turkey

Statement:

21. Based on data from *the Trade Map* website during the period under investigation, exports of woven cotton products from Turkey to Indonesia were no more than 3%. Therefore, in accordance with the provisions of *Article 9.1* AoS, as a developing country with an import share below 3%, Turkey should be exempt from the imposition of *Safeguards*.

KPPI's response to the statement from the Directorate General of Imports, Ministry of Trade, Turkiye Republic:

22. Answer to point 21, according to the results of the KPPI investigation, it is known that in 2024 the share of imports of Woven Fabrics from Cotton from Turkey is less than 3%, so in accordance with the provisions of *Article 9 AoS*, Turkey as a developing country is exempt from the imposition of *Safeguards*.

B.1.3. Department of Foreign Trade, Kingdom of Thailand

Statement:

23. In 2019-2022, imports of woven fabric products from cotton originating from Thailand is below 3%. According to *Article 9.1* of the *AoS*, as a developing country with an import share below 3%, Thailand should be exempt from the *Safeguard*.

Response to the statement from the Department of Foreign Trade, Kingdom of Thailand:

24. Answer to point 23, according to the results of the KPPI investigation, it is known that in 2024 the share of imports of Cotton Woven Fabrics from Thailand is less than 3%, so in accordance with the provisions of *Article 9 AoS*, Thailand as a developing country is exempt from the imposition of *Safeguards*.

B.1.4. China Chamber of Commerce for Import and Export of Textiles (CCCT) represented by Yang & Co Law Office

CCCT Statement dated December 2, 2023, consisting of:

25. The Applicant's losses in this case API, were solely caused by unable to compete in terms of quality and quantity with foreign products, labor wage issues, and the impact of the Covid-19 outbreak, as well as The Applicant's production capacity is insufficient to meet national consumption. Furthermore, it was stated that there are no plans for structural adjustments to the API to increase competitiveness.

KPPI's response to the statement from CCCT dated December 2, 2023

26. Answer to point 25, The losses experienced by the Applicant **were not caused by other factors** such as labor wages and Covid-19. Based on the results of the KPPI investigation, in producing Woven Fabric from Cotton, the Applicant has the latest technology that is more effective and efficient which can produce quality Woven Fabric from Cotton. In addition, the Applicant also has national and **international certificates** as explained in the section The losses experienced by the Applicant were solely caused by the surge in the number of imported goods (this is explained in detail in sections C.2.1 and C.3).

Based on the results of the investigation, it is known that in 2024 the national installed capacity **is greater** than national consumption, with the proportion of national consumption to national installed capacity being 48.5% as explained in point 57.

The structural adjustment program plans that the Applicant will undertake to increase competitiveness are explained in more detail in section E.

B.1.5. PT. Metro Garmin**Statement:**

27. PT. Metro Garmin (Importer) requests an exception to the implementation of *safeguards* for producers who obtain Bonded Zone facilities, whose products will be exported to other places within the Customs Area.

KPPI's response to PT Metro Garmin's statement

28. Imported goods that enter the Bonded Zone and are released to other places within the Customs Area are subject to *safeguards* in accordance with the provisions of applicable laws and regulations.

B.1.6. National Development Planning Agency of Indonesia (BAPPENAS)**Statement:**

29. For the commodity of Woven Fabric from Cotton, import volume data shows that there has been an increase but there has been no surge in imports of Woven Fabric from Cotton.

Based on BAPPENAS' analysis of the competitiveness of these products through the *Revealed Competitive Advantage* (RCA) calculation, it was found that many of the proposed products did not have competitiveness. global as indicated by an RCA score <1 and this score tends to decline. If BMTP is imposed, it is suspected that this will result in a deeper decline in the competitiveness of the product. the.

Based on this analysis, BAPPENAS believes that not all products have experienced a surge in imports. The KPPI needs to examine the products proposed by the applicant in more detail and consider their future impact on the macroeconomy, upstream and downstream industries, and trade performance. Further investigation can only be conducted on products experiencing a surge in imports.

B.1.7. Directorate of Textile, Leather, and Footwear Industry, Ministry of Industry**Statement:**

30. On the request for an investigation in the context of the imposition of TPP on Due to the surge in imports of woven cotton fabrics, the applicant submitted HS codes for printed fabrics using batik and ikat weaving processes. In this regard, the Ministry of Industry expects KPPI to ensure the applicant has a business license with KBLI 13122-

Ikat Woven Fabric Industry for Applicants producing Ikat Woven Fabric. This relates to the investment requirements for both KBLIs as stipulated in Presidential Regulation Number 10 of 2021 in conjunction with the Regulation. Presidential Regulation Number 49 of 2021 concerning Investment Business Sectors.

All applications need to ensure conformity between the HS code of the goods under investigation and the goods produced by the Applicant (IDN).

B.1.8. Directorate of Customs Technical Affairs, Ministry of Finance**Statement:**

31. The Ministry of Finance conveyed several responses as follows:

- a. The Ministry of Finance supports the imposition of BMTP on imported goods in accordance with applicable provisions, but must still consider the ease of implementing the collection in accordance with Article 84 paragraph 7 of PP Number 34 of 2011 concerning Antidumping Measures, Countervailing Measures, and Trade Safeguard Measures;
- b. KPPI should consider the ease of implementation and law enforcement in implementing the provisions of BMTP, DJBC as an institution that oversees the effectiveness of the imposition of BMTP, requires a strong legal basis and encourages the acceleration of the issuance of legal regulations used as *tools* in implementing BMTP, namely the Draft Government Regulation on Safeguard Measures, Anti-dumping Measures and Countervailing Measures (RPP TPTATI), and the Draft Regulation of the Minister of Trade which regulates the provisions of Non-Preferential Certificates of Origin;
- c. It would be better if KPPI also considers the effectiveness and fairness aspects of the imposition of BMTP, as well as its imposition using specific rates, so as to minimize the practice of under *-invoicing* and manipulation of customs values, and can create certainty in the business world;
- d. Furthermore, in terms of ease of implementation in terms of supervision of imported goods in the field, it is proposed that the imposition of BMTP be carried out at least on all tariff items at the same HS sub-item level, so as to minimize the level of difficulty in supervision which can have an impact on increasing *dwelling time*, and can anticipate the occurrence of *circumvention* practices of transferring HS codes to imported goods that are not subject to BMTP;
- e. In connection with this matter, in point d above it is proposed that further and in-depth internal discussions be carried out.

B.2. Other Statements

Statements submitted by letter/electronic mail (*email*) during the investigation.

Letter dated March 25, 2024 from the China Chamber of Commerce for Import and Export of Textile (CCCT) is represented by Yang & Co Law Office:

32. The application of *Safeguards* to woven cotton fabrics should be rejected for the following reasons:

- 1) The *Safeguards* element as stipulated in Article 70 of PP 34/2011 is not fulfilled because the import of the Investigated Goods does not threaten the domestic industry. In addition, the Investigated Goods are not

NO SECRET

These are products that compete directly with domestic products. Furthermore, there is no causal relationship between imports of the products under investigation and losses to the domestic industry. This is because local and imported products do not compete directly, and the losses to the domestic industry are caused by illegal imports.

- 2) The government has protected local industries through Minister of Trade Regulation 3/2024 for Investigated Goods. Therefore, the implementation of *Safeguard* import duties will make the Applicant overprotected, unable to develop, and unable to compete in international trade. Furthermore, *Safeguard* measures also impact national interests, such as the local garment industry that uses imported cotton from China as its raw material.

With the imposition of *Safeguard*, the local garment industry must purchase imported cotton fabric at higher prices and will threaten the domestic garment industry.

KPPI's Response to CCCT's Statement dated March 25, 2024

33. The answer to point 32, regarding the CCCT statement on March 25, 2024, is as follows:

- 1) Based on the results of the investigation, it is known that the Applicant suffered serious losses caused by the surge in the number of imports of similar/directly competing goods as explained further in section C, this has fulfilled the requirements for imposing Safeguard Measures as stipulated in the provisions of AoS Art. 2.1. and PP 34 of 2011 Article 70. Regarding the cause-effect relationship, it is explained further in section C.4.
- 2) Safeguard Measures are a separate imposition and are not related to other instruments, and based on the results of the investigation, the recommendations for Safeguard Measures on imports of Woven Fabric products from Cotton have fulfilled the requirements stipulated in the AoS and PP 34 of 2011.

Letter dated July 30, 2025 from China Chamber of Commerce for Import and Export of Textile (CCCT) represented by Yang & Co Law Office:

34. The investigation into the allegations of Safeguard Measures on Imports of Investigated Goods ("Safeguards Investigation/ *Safeguards Investigation*") has been ongoing since the commencement of the investigation by KPPI on October 27, 2023. Based on notification *supplement* 12.1(a) No.

G/SG/N/6/IDN/40/Suppl.1 dated 16 July 2025, CCCT conveyed the following:

- a. Regarding the addition of the scope of HS No., there is no information on the number of imports of the additional Investigated Goods that shows any indication of a surge in the number of imported goods nor is there any initial evidence regarding the existence of serious losses or threats of serious losses from the Applicant and domestic industry regarding the import of the additional Investigated Goods.

NO SECRET

- b. Article 78 paragraph 1 (a) and paragraph 2 of Government Regulation No. 34 of 2011 concerning Antidumping Measures, Countervailing Measures, and Trade Safeguard Measures ("PP No. 34/2011") also requires that any information and explanation requested and received by KPPI from Applicants, importers and related parties must be made in confidential and non-confidential versions.

Alternatively, CCCT requests that KPPI consider terminating the *Safeguard* Investigation and that KPPI commence a new investigation into the Additional Investigated Goods.

KPPI's Response to CCCT's Statement dated July 30, 2025

35. Based on CCCT's input in point 34, we can convey the following:
following:

- 1) In accordance with the provisions of *Article 12* AoS and Article 92 PP 34/2011, notification **must only be made to**

WTO *Safeguards* Committee , the notification consists of:

- a) Commencement of investigation in order to impose Actions Security;
- b) Imposition of Temporary Safeguard Measures;
- c) Findings of the Investigation of Safeguard Measures; d)

Imposition of Safeguard Measures.

In the investigation, KPPI has fulfilled the notification obligations as stipulated in *Article 12* of the AoS above. The notification can be downloaded from the WTO website (www.wto.org). and the KPPI website (www.kppi.kemendag.go.id). KPPI also implements openness (transparency), KPPI always informs every update in the investigation to the WTO *Safeguards* Committee , one of which is:

regarding the addition of HS No. which was investigated through notification No. G/SG/N/6/IDN/40/Suppl.1. dated July 16, 2025.

KPPI is **obliged to maintain** all data declared confidential by the data provider, as stipulated in the provisions of *Art. 3.2.* AoS and Article 78 paragraph (3) of PP 34/2011. Therefore, any request from an Interested Party (PYB) regarding investigation data cannot be granted without the permission of the data provider.

- 2) Regarding the addition of the HS No. being investigated, this is a **legitimate** action to take, as regulated in the provisions of *Art. 4.2(a)* AoS:

*"In the investigation to determine whether increased imports have caused or are threatening to cause serious injury to a domestic industry under the terms of this Agreement, **the competent authorities shall evaluate all relevant factors** of an objective and quantifiable nature having a bearing on the situation of that industry, in particular, the rate and amount of the increase in imports of the product concerned in absolute and relative terms, the share of the domestic market taken by increased imports, changes in the level of sales, production, productivity, capacity utilization, profits and losses, and employment."*

This was also later confirmed by the decision of the panel handling the Türkiye dispute *against* the imposition of Safeguard Measures on *Certain Steel Products* – EU, the panel in its main decision **allowed the European Commission** to examine the products (add goods) under investigation in detail.

*"Given that it applied the definitive safeguard on a product consisting of 26 product categories, taken together, the European Commission was required, at a minimum, to investigate the existence of the necessary circumstances and conditions for that product. At the same time, this **did not preclude** the European Commission from examining that product, additionally, at a more disaggregated level".*

In accordance with the provisions of Art. 4.2(a) AoS and the panel decision above, it can be concluded that during the investigation period the authorities **can conduct an in-depth examination** of all relevant factors, including increasing or reducing the scope of the goods being investigated.

3) As stipulated in the provisions of Art. 2.1. AoS:

*"A Member may apply a safeguard measure to a product only if that Member has determined, subject to the provisions set out below, that such product is being imported into its territory in such **increased quantities, absolute or relative to domestic production, and under such conditions as to cause or threaten to cause serious injury to the domestic industry** that produces like or directly competitive products."*

and Article 70 paragraph (1) PP 34/2011:

"Imported goods, in addition to being subject to import duty, may be subject to action. Security if:

- a) there is **an absolute or relative increase** in the number of imports of goods that are the same as similar goods or goods that directly compete; and
- b) the surge in the number of imported goods as referred to in letter a causes **Serious Losses or the Threat of Serious Losses** towards Domestic Industry".

Therefore, according to the results of the KPPI investigation, the imposition of Safeguard Measures on imports of Woven Fabrics from Cotton has **fulfilled the** above requirements, which are further explained in sections C.2 and C.3.

C. INVESTIGATION

C.1. Proof of Similar Goods or Goods that are Directly Compete

36. In order to prove that the Investigated Goods are similar goods or directly compete with the Cotton Woven Fabric produced by the Applicant, KPPI has requested evidence of data and information by sending questionnaires and field verification to the Applicant. In addition, KPPI also obtained evidence of data and information regarding the specifications of the imported goods from the Importer and the association of producers of the origin of the imported Goods Investigated.

C.1.1. Woven Fabrics Made of Cotton Produced by the Applicant

37. The characteristics, production process flow, raw materials, technical specifications and uses of the cotton woven fabric produced by the Applicant are as follows:

Physical Characteristics

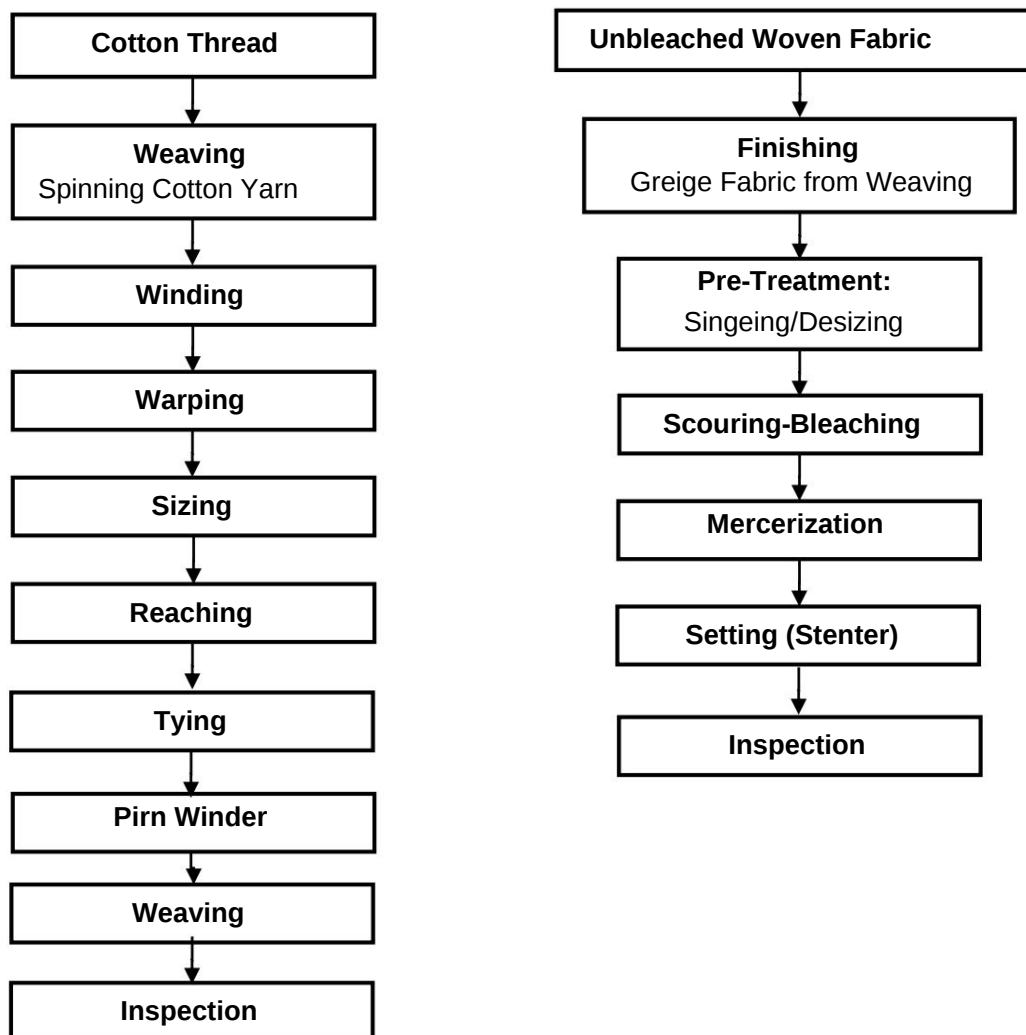
The Applicant's production goods have the following physical characteristics:

- 1) Unbleached, namely fabric that has the natural color of the fibers that form it, has not been bleached, dyed or printed.
- 2) Bleached, namely:
 - has gone through a *bleaching process*.
 - contains bleached threads.
 - contains a mixture of bleached and unbleached yarns bleached.
- 3) Dipped, namely:
 - dyed with one kind of uniform color, other than color white.
 - contains threads of uniform color.
- 4) From multi-colored threads, namely woven fabrics (other than printed fabrics) which:
 - contains threads of different colors, or threads of the same color but with different shades.
 - contains bleached or unbleached yarn and colored yarn.
- 5) Printed, namely woven fabric that has gone through a printing process, whether it contains multi-colored threads or not, including woven fabric that is printed with patterns, such as with a spray gun or brush, with screen printing, or the batik process.

Production Process Flow

The flow of the production process for woven fabric from cotton is as follows:

Figure 1. Flow of the Production Process for Woven Fabric from Cotton



Source: Applicant

Description:

- *Winding*: the process of winding thread from *cops/pallets* into cones .
- *Warping*: the process of transferring warp yarn rolls from *cones/cheses* to *beam warping* rolls in a parallel and even manner.
- *Sizing*: is the process of coating the warp yarn with a starch solution to strengthen the yarn during the weaving process and increase its resistance to friction.
- *Reaching*: the process of inserting the warp thread into the *dropper gun hole*, and comb the weaving according to the weave to be produced.

- *Tying*: the process of connecting the warp threads from *the sizing beam* to the *sizing beam*. woven with the same construction.
- *Pin winder*: the process of moving the weft yarn roll from the form *cones* into *pallets* to *supply the shuttle machine*.
- *Weaving*: the process of crossing warp and weft threads at a 90 degree angle to form a woven fabric.
- *Inspection*: the process of inspecting the woven fabric results for identify *the grade of greige fabric*.
- *Pre-treatment*: the process of cleaning dirt from the previous process by burning the hair, and removing the remaining starch in the *sizing process*.
- *Scouring/bleaching*: the process of bleaching fabric.
- *Mercerization*: the process of increasing the absorbency of fabric for color absorption.
- *Setting/ stenter*: the process of widening the fabric towards the width of the fabric, to get a uniform fabric width.
- *Inspecting*: the process of inspecting production results

Raw Materials

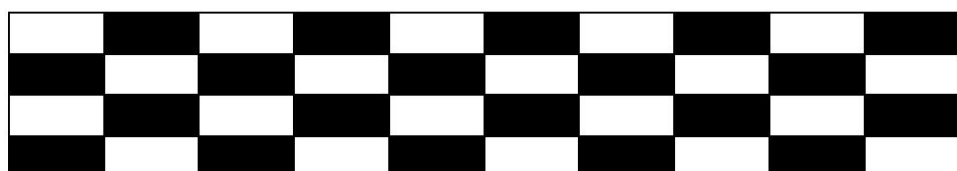
for the Applicant's Production Goods have the same raw materials as the imported goods, namely: cotton thread.

Technical Specifications

The technical specifications of the Applicant's woven cotton fabric are:

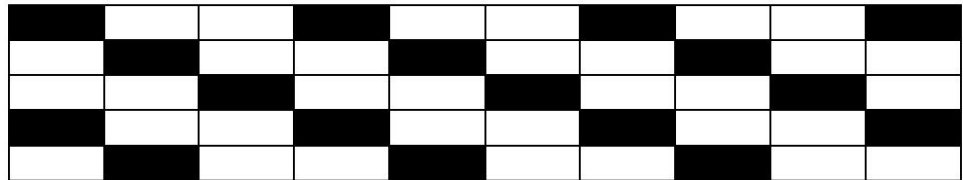
- 1) Cotton content in woven fabric:
 - containing 85% or more cotton by weight • containing less than 85% cotton by weight, mixed mainly or solely with man-made fibers.
 - others from cotton.
- 2) Weight of woven fabric:
 - fabric weight is not more than 200 g/m² and • fabric weight is more than 200 g/m² .
- 3) Woven fabric construction:
 - Plain weave fabric is a fabric construction made by crossing the weft threads over the warp threads and then under the warp threads alternately and repeatedly.

Example of plain woven fabric image:



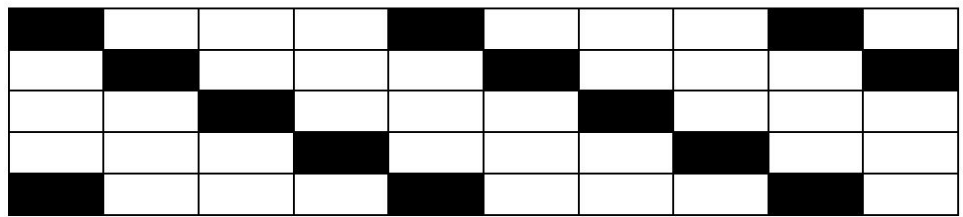
- **3 thread twill woven fabric** is a fabric construction made by crossing the weft thread over the first warp thread and then passing through 2 (two) strands of warp thread and continuing to repeat.

Example of a 3 thread twill woven fabric:



- **A 4-thread twill woven fabric** is a fabric construction made by crossing the weft thread over the first warp thread and then passing through 3 (three) strands of warp thread and continuing to repeat.

Example of a 4 thread twill woven fabric:



- **Denim fabric** is a fabric construction that is made to make jeans material .

Example of denim fabric image:



Utility

The Applicant's Production Goods have the same use as imported goods, namely as raw materials for clothing and clothing accessories.

C.1.2. Imported Goods

38. In accordance with Article 1 Number 27 of PP 34/2011, the Goods Under Investigation are imported goods which have experienced a surge in quantity, which are the object of investigation, stated with a description and specifications of the goods and the tariff post number according to BTKI.

39. Based on the investigation, the imported goods investigated based on BTKI 2022 are:

Woven Fabric from Cotton with 25 (twenty five) No. 8-digit HS is 5208.21.00, 5208.22.00, 5208.31.90, 5208.33.0, 5208.51.10, 5208.52.10, 5209.11.90, 5209.21.00, 5209.31.00, 5209.49.00, 5209.51.10, 5209.59.10, 5210.21.00, 5210.32.00, 5210.51.10, 5210.59.10, 5210.59.90, 5211.31.00, 5211.59.10, 5211.59.90, 5212.15.10, 5212.15.90, 5212.21.00, 5212.23.00, 5212.25.10.

40. The characteristics, raw materials, technical specifications and uses of imported goods are as follows:

Characteristics

The characteristics of imported woven cotton fabrics are the same as the characteristics produced by the Applicant as in point 37.

Raw material

The raw materials for imported goods are generally the same as those produced by the Applicant as stated in point 37.

Technical Specifications

The technical specifications of imported goods are generally the same as those produced by the Applicant as stated in point 37.

Utility

The use of imported goods is the same as that produced by the Applicant, namely as in point 37.

C.1.3. Conclusion of Evidence of the Investigated Goods

41. Based on explanation 37-40, it can be concluded that the imported goods are Woven Fabric from Cotton with 25 (twenty five) 8-digit HS No., namely:

5208.21.00, 5208.22.00, 5208.31.90, 5208.33.00, 5208.51.10, 5208.52.10, 5209.11.90, 5209.21.00, 5209.31.00, 5209.49.00, 5209.51.10, 5209.59.10, 5210.21.00, 5210.32.00, 5210.51.10, 5210.59.10, 5210.59.90, 5211.31.00, 5211.59.10, 5211.59.90, 5212.15.10, 5212.15.90, 5212.21.00, 5212.23.00, 5212.25.10,

According to the 2022 BTKI (**Attachment 2**), these are **similar goods or goods that directly compete with the goods produced by the applicant** because they have similar characteristics, raw materials, technical specifications, and uses.

C.2. Surge in the Number of Imported Goods Under Investigation

C.2.1. Absolute Surge in Imports

Table 3. Total Absolute Number of Imported Goods Investigated

Description	Year				Growth (%) 2021 -			Trend (%)
	2021	2022	2023	2024	2022	2022 - 2023	2023 - 2024	2021 - 2024
Amount Imports (tons)	16,963	20,909	20,580	20,637	23.26	(1.58)	0.28	5.89

Source: Ministry of Trade Information System Data Center (PDSI), BPS, processed.

42. Based on Table 3 above, the absolute import volume experienced an upward trend of 5.89% from 2021 to 2024. In 2021, imports were 16,963 tons, increasing to 20,909 tons in 2022, or 23.26%. Then, in 2023, imports decreased to 20,580 tons or 1.58%, and then in 2024 the number of imports increased again to 20,637 tons or 0.28%.

C.2.2. Surge in Imports Relative to National Production

Table 4. Relative Imports of All Goods Investigated Compared to National Production

Description	Year				Growth (%) 2021 -			Trend (%)
	2021	2022	2023	2024	2022	2022 - 2023	2023 - 2024	2021 - 2024
Import Amount (tons)	16,963	20,909	20,580	20,637	23.26	(1.58)	0.28	5.89
Production National (Index)	100	87.98	76.19	69.39	(12.02)	(13.39)	(8.93)	(11.66)
Relative Import (Index)	100	140.10	159.22	175.31	40.10	13.65	10.10	19.87

Source: PDSI Ministry of Trade, BPS, KPPI verification results, processed.

43. As shown in Table 4 above, from 2021 to 2024, imports increased significantly relative to national production, with a trend of 19.87%. This is because, while imports increased, domestic production continued to decline. In 2021, relative imports increased by 100 index points to 140.10 index points in 2022. Then in 2023, relative imports increased again to 159.22 index points, then in 2024, the number of imports increased again to 175.31 index points.

C.2.3. Market Share of Importing Countries of Origin

Table 5. Market Share of Import Origin Countries

No. Rank	Country of Origin of Import	2024	
		Volume (Tons)	Share (%)
1	People's Republic of China	17,006	82.40
2	Vietnam	1,039	5.04
3	India	999	4.84
4	Hong Kong	638	3.09
5	Other Countries of the World	20,637	100
Source: PDSI			
Ministry			

of Trade, BPS, processed.

44. As in Table 5 above, the largest country of origin for imports in 2024 was the People's Republic of China (PRC) with a share of 82.40%, followed by Viet Nam with a share of 5.04%, India with a share of 4.84%, Hong Kong with a share of 3.09%, and other countries (e.g. South Korea, Pakistan, Taiwan, Thailand, etc.), with an import market share of 4.63%.

C.2.4. Unforeseen Development

45. The surge in imports from the countries of origin of the Goods Under Investigation was an unforeseen *development*. This was due to the US-PRC trade war, the increase in cotton woven fabric production in India, and the unexpected increase in textile production capacity in Vietnam.

46. United States Import Ban on Uyghur Products from China

On June 21, 2022, the United States issued a policy to ban textile imports from the PRC, especially from Xinjiang province, if the products are made by Uyghur workers in Xinjiang, PRC.

These regulations are regulated in *section 2 of public law no. 117-78, An Act to ensure that goods made with forced labor in the Xinjiang Uyghur Autonomous Region of the People's Republic of China do not enter the United States America, and for other purposes (the Uyghur Forced Labor Prevention Act)*.

With the implementation of the above regulations, imports of Woven Fabric products from Cotton from the PRC in the United States experienced a decline with a trend of 10.66% during the 2021 - 2024 period as shown in Table 6 below, so that the PRC shifted the export destination of its Woven Fabric from Cotton to other countries, one of which was Indonesia.

This then unexpectedly caused a surge in imports of woven cotton fabrics from the PRC in Indonesia.

Table 6. Export Data of Woven Fabrics from PRC Cotton (Tons)

Country Objective	Year				Change (%) 2021 -			Trend (%)
	2021	2022	2023	2024	2022	2022 - 2023	2023 - 2024	2021 - 2024
Export PRC to US	1,846	1,378	1,275	1,301 (25.35)	(7.47)		2.04	(10.66)
Export PRC to Indonesia	14,448	17,635	18,419	17,005	22.05	4.45	(7.68)	5.47

Source: Trade map and BPS

47. Restrictions on Exports of Cotton Raw Materials Have an Impact on Increasing Production of Cotton Woven Fabrics in India

In 2022, world cotton prices experienced a sharp increase of almost 2 (two) times compared to the previous year.¹ *Tiruppur*

Exporters Association (TEA), an association of Indian cotton fabric exporters, has asked the Indian government to ban cotton exports to ensure the availability of raw materials and stabilize prices.²

The plan to ban cotton exports by the Indian Government has resulted in an increase in the production of woven fabrics from cotton, so that exports of woven fabrics from Indian cotton have also increased throughout the world. This also led to an unexpected surge in exports of woven cotton fabrics from India to Indonesia.

Table 7. Export Data of Woven Fabric Products from Indian Cotton for the Period 2021-2024 (In Tons)

Country	2023			
	2021	2022	2023	2024
World	245,522	1,072	1,743	4,051
Indonesia				891,705
				6,764

Source: Trade map

48. Unpredictable Increase in Textile Production Capacity in Vietnam

Vietnam is known as a textile production hub with a *Cut-Make-Trim (CMT)* or custom-made production model. In 2023, the Vietnamese textile industry unexpectedly shifted its textile production model to *Original Design Manufacturing (ODM)* and *Original Brand Manufacturing (OBM)* models. This shift in Vietnam's textile industry strategy led to an increase in production capacity, technology, and resources.

¹ The Indian Express, "Textile, Garment Industries Demand Cotton Exports Ban: Explained," April 8, 2022, <https://indianexpress.com/article/explained/textile-garment-industries-demand-cotton-exports-ban-explained-7928198/>

² Tiruppur Exporters' Association (TEA), "TEA Urges Indian Govt to Ban Cotton Export to Stop Abnormal Price Rise," TEA India, January 11, 2022, <https://www.tea-india.org/news-board/16404-tea-urges-indian-govt-to-ban-cotton-export-to-stop-abnormal-price-rise-11th-january-2022>

³ "OBM, ODM modes considered for Vietnam's textile and production," Vietnamnet, accessed August 8, 2025, <https://vietnamnet.vn/en/obm-odm-modes-considered-for-vietnams-textile-and-production-E197972.html>.

human capital in Vietnam's textile industry. The impact of this increase has led to an increase in exports of woven cotton products. Vietnam is massively expanding throughout the world, including to Indonesia.⁴

C.2.5. Effects of GATT 1994 bonds

49. Based on Article XIX of GATT 1994 "the effect of the obligations incurred", the maximum limit of Indonesia's concession tariff for Goods The Investigated is 30% *ad valorem*. During the investigation period, Indonesia has reduced import product tariffs in many sectors including Woven Fabrics from Cotton with an average *Most Favoured Nation* tariff. (MFN), which is 10%-20%. Thus, the surge in imports is a result of the impact of WTO obligations and unforeseen developments, as explained in points 46-48.

C.3. Serious Loss / Threat of Serious Loss

C.3.1. Applicant Performance

50. The Applicant's performance data in points 51-53 was obtained from the analysis of questionnaire responses and verification. Six performance indicators were analyzed: **production volume, sales volume, productivity, utilized capacity, profit/loss, and workforce.**

Domestic Sales and Production

51. During the 2021-2024 period, domestic sales experienced a downward trend of 10.45%. In line with the downward trend in domestic sales, the Applicant's production also experienced a similar trend of 10.21%. This is because in 2024, the Applicant was unable to increase its domestic production and sales as previously planned. 2021 because the domestic market is still flooded with imported goods, as can be seen in Table 8 below.

Table 8. Domestic Sales and Production

Unit Description		Year				Change (%)			Trend (%)
		2021	2022	2023	2024	2021-2022	2022-2023	2023-2024	2021-2024
Production	Index	100	93.09	81.98	72.86 (691)	(11.93)	(11.13)		(10.21)
Sale Domestic	Index	100	91.22	81.11	71.97 (878)	(11.08)	(11.27)		(10.45)

Source: KPPI Verification Results

4 "Diversifying material sources opens door to sustainable supply chain," *VietnamPlus*, April 19, 2023, accessed 8 August 2025, <https://en.vietnamplus.vn/diversifying-material-sources-opens-door-to-sustainable-supply-chain-post251793.vnp>.

Production and Capacity Utilization

52. In the 2021-2024 period, the production volume experienced a decline with a trend of 10.21% which caused the capacity utilization to also experience a decline with a trend of 10.31%, as can be seen in Table 9 below.

Table 9. Production and Capacity Utilization

Unit Description		Year				Change (%)			Trend (%)
		2021	2022	2023	2024	2021-2022	2022-2023	2023-2024	2021-2024
Production	Index	100	93.09	81.98	72.86	(6.91)	(11.93)	(11.13)	(10.21)
Capacity Used	Index	100	93.00	81.74	72.65	(7.00)	(12.11)	(11.12)	(10.31)

Source: KPPI Verification Results

Production, Labor, Productivity, and Profit/Loss

53. In the 2021-2024 period, the workforce experienced a reduction with a trend by 6.62%. This decrease in the workforce is in line with the decline in production resulting in cost efficiency so that the financial losses experienced by the Applicant decreased annually with a trend of 58.17%.

During the same period, the Applicant's productivity experienced a downward trend of 3.84%. This was because the decline in production volume was much greater than the decline in workforce, at 10.21% and 6.62%, respectively, as seen in Table 10 below.

Table 10. Production, Labor, Productivity, and Profit/Loss

Description	Unit	Year				Change (%)			Trend (%)
		2021	2022	2023	2024	2021-2022	2022-2023	2023-2024	2021-2024
Production	Index	100	93.09	81.98	72.86	(6.91)	(11.93)	(11.13)	(10.21)
Labor Index		100	90.88	88.65	80.24	(9.12)	(9.49)	(6.62)	(2.45)
Productivity	Index	100	102.44	92.48	90.81	2.44	(1.81)	(3.84)	(9.72)
Profit/(Loss)	Index	(100)	(49.50)	(18.60)	(7.58)	(50.50)	(62.41)	(59.25)	(58.17)

Source: KPPI Verification Results

54. Based on points 51-53, it can be concluded that during the 2021-2024 period, the Applicant experienced serious losses based on performance indicators, namely the downward trend in production, domestic sales, productivity, utilized capacity, workforce, and the occurrence of financial losses.

C.3.2. National Consumption and Market Share

Table 11. National Consumption, Import Amount, IDN Domestic Sales, Import Market Share, and IDN Market Share

Description	Unit	Year						Change (%)			Trend (%)
		2021	2022	2023	2024	2021-2022	2022-2023	2023-2024	2021-2024		
1. National Consumption	Index 100	97.67	88.73	81.09	(2.33) (9.15) (8.61)	(6.99)					
2. Applicant's market share 3.	Index 100	93.40	91.42	88.76	(6.60) (2.12) (2.92)	(3.72)					
Non-Applicant's market share 4.	Index 100	97.00	94.91		92.49 (3.00) (2.16)	(2.55) (2.53)					
Import market share	Index 100	126.21	136.73	150.02	26.21		8.34	9.72	13.85		

Source: BPS, API, KPPI Verification Results, processed.

55. Based on Table 11 above:

- a. During the 2021-2024 period, national consumption experienced a decline with a trend of 6.99%, with the largest decline occurring in 2023 at 9.15% compared to the previous year, namely from 97.67 index points to 88.73 index points.
- b. As a result of the increase in the import market share with a trend of 13.85%, it resulted in a decrease in the market share of the Applicant and Non-Applicant by 3.72% and 2.53% respectively.

C.3.3. Other Factors

56. KPPI also analyzed other factors apart from the surge in the number of imported goods, which could affect the Applicant's serious losses as follows:

a) Technology

Based on the results of the investigation, the Applicant has the latest technology in producing the Investigated Goods. This is supported by the fact that the Applicant's machines are capable of producing the Investigated Goods, which produce various types of fabrics using the latest technology, a colored fabric dyeing machine, and a batik and other motif printing machine. This indicates that the Applicant's serious losses were not caused by technological factors.

b) Quality

The quality of the goods produced by the Applicant has met the standards set nationally and internationally, with certificates such as **SNI** (0560:2008, 08-1793-1990, 0276:2009, 0562:2009) and **OEKO-TEX** (international certificate for the safety of textile products from hazardous chemicals/toxic substances). Thus, the goods produced by the Applicant in terms of quality are able to compete with imported goods because they comply with domestic and international standards.

c) National Installed Capacity**Table 12. Comparison of Installed Capacity and National Consumption**

Description	Unit	2021	2022	2023	2024
National Consumption of National Installed Capacity	%	37.1	40.2	41.2	48.5

Source: KPPI Verification Results, processed.

57. As seen in Table 12 above, during the 2021-2024 period, national consumption never exceeded national installed capacity, so that national consumption could be met by the Domestic Industry.
58. As explained in point 56, there were no other factors that contributed to the serious losses experienced by the Applicant other than the surge in the number of imports of the Investigated Goods.

C.4. Cause-Effect Relationship

59. During the 2021-2024 period, it can be concluded that there was evidence of serious losses experienced by the Applicant due to the surge in the number of imports of the Investigated Goods and not caused by other factors, which is based on several pieces of evidence, namely:
- a) There was an absolute surge in the number of imports of Investigated Goods with a trend of 5.89%, while the relative surge in the number of imports of Investigated Goods with a trend of 19.87%.
 - b) The import market share has increased with a trend of 13.85%, but the Applicant's market share has decreased with a trend of 3.27%.
 - c) There is a downward trend in production, domestic sales, productivity, used capacity, workforce, and financial losses.
 - d) According to the explanation in point 56, there are no other factors that caused the serious losses experienced by the Applicant other than the spike in the number of imports of the Goods Under Investigation.

D. RECOMMENDATIONS

60. Based on the results of the investigation (part C), KPPI recommends the imposition of BMTP in the form of specific tariffs on imports of Woven Fabric products from Cotton on 25 (twenty five) 8-digit HS No. according to BTKI in 2022 as follows:

Table 13. Recommendations for Imposing BMTP

No	HS No.	Unit	BMTP (<i>Specific Duty</i>)		
			Year I	Year II	Year III
1	5208.21.00	Rp/Meter	9,577	9,013	8,482
2	5208.22.00	Rp/Meter	9,467	8,909	8,384
3	5208.31.90	Rp/Meter	9,610	9,044	8,511
4	5208.33.00	Rp/Meter	9,415	8,860	8,338
5	5208.51.10	Rp/Meter	10,585	9,962	9,375
6	5208.52.10	Rp/Meter	14,702	13,836	13,021
7	5209.11.90	Rp/Meter	10,624	9,998	9,409
8	5209.21.00	Rp/Meter	9,646	9,077	8,543
9	5209.31.00	Rp/Meter	9,338	8,788	8,271
10	5209.49.00	Rp/Meter	9,228	8,685	8,173
11	5209.51.10	Rp/Meter	16,974	15,974	15,033
12	5209.59.10	Rp/Meter	16,740	15,754	14,827
13	5210.21.00	Rp/Meter	8,785	8,268	7,781
14	5210.32.00	Rp/Meter	9,501	8,942	8,415
15	5210.51.10	Rp/Meter	20,675	19,457	18,311
16	5210.59.10	Rp/Meter	21,144	19,898	18,726
17	5210.59.90	Rp/Meter	10,887	10,246	9,643
18	5211.31.00	Rp/Meter	9,467	8,910	8,385
19	5211.59.10	Rp/Meter	18,590	17,495	16,464
20	5211.59.90	Rp/Meter	12,668	11,922	11,220
21	5212.15.10	Rp/Meter	14,042	13,215	12,437
22	5212.15.90	Rp/Meter	13,127	12,354	11,627
23	5212.21.00	Rp/Meter	9,639	9,071	8,537
24	5212.23.00	Rp/Meter	10,750	10,117	9,521
25	5212.25.10	Rp/Meter	13,966	13,143	12,369

61. The amount of BMTP imposed for each HS No. is adjusted to the selling price of each HS No. in Meter units. The largest BMTP amount is HS No. **5210.59.10** amounting to Rp. 21,144/meter in year I, namely **fabric printed with the traditional batik process**, while the smallest BMTP amount is HS No. **5210.21.00** amounting to Rp. 8,785/meter in year I, namely **plain woven fabric (greige)**.

62. In accordance with the provisions of Article 90 PP 34/2011 and Article 9.1 of the *WTO Agreement on Safeguards*, BMTP is imposed on products originating from all countries, except developing countries whose import share does not exceed 3% (three percent), or cumulatively does not exceed 9% (nine percent) of total imports as long as each developing country has an import share of less than 3% (three percent).

Table 14. List of WTO Member Countries Excluded from BMTP

No.	Country	No.	Country
1	Afghanistan	36	El Salvador
2	Albania	37	Eswatini
3	Angola	38	Fiji
4	Antigua and Barbuda	39	Gabon
5	Argentina	40	Gambia, The
6	Armenia	41	Georgia
7	Bahrain, Kingdom of	42	Ghana
8	Bangladesh	43	Grenada
9	Barbados	44	Guatemala
10	Belize	45	Guinea
11	Benin	46	Guinea Bissau
12	Bolivia, Plurinational State of	47	Guyana
13	Botswana	48	Haiti
14	Brazil	49	Honduras
15	Brunei Darussalam	50	Israel
16	Burkina Faso	51	Jamaica
17	Burundi	52	Jordan
18	Cabo Verde	53	Kazakhstan
19	Cambodia	54	Kenya
20	Cameroon	55	Korea, Republic of
21	Central African Republic	56	Kuwait, the State of
22	Chad	57	Kyrgyz Republic
23	Chile	58	Lao People's Democratic Republic
24	Colombia	59	Lesotho
25	Comoros	60	Liberia
26	Congo	61	Macao, China
27	Costa Rica	62	Madagascar
28	Cote d'Ivoire	63	Malawi
29	Cuba	64	Malaysia
30	Democratic Republic of the Congo	65	Maldives
31	Djibouti	66	Mali
32	Dominica	67	Mauritania
33	Dominican Republic	68	Mauritius
34	Ecuador	69	Mexico
35	Egypt	70	Moldova, Republic of

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No.	Country	No.	Country
71	Mongolia	97	Seychelles
72	Montenegro	98	Sierra Leone
73	Morocco	99	Singapore
74	Mozambique	100	Solomon Islands
75	Myanmar	101	South Africa
76	Namibia	102	Sri Lanka
77	Nepal	103	Suriname
78	Nicaragua	104	Taipei, China
79	Niger	105	Tajikistan
80	Nigeria	106	Tanzania
81	North Macedonia	107	Thailand
82	Oman	108	Timor-Leste
83	Pakistan	109	Togo
84	Panama	110	Tonga
85	Papua New Guinea	111	Trinidad and Tobago
86	Paraguay	112	Tunisia
87	Peru	113	Turkey
88	Philippines	114	Uganda
89	Qatar	115	Ukraine
90	Rwanda	116	United Arab Emirates
91	Saint Kitts and Nevis	117	Uruguay
92	Saint Lucia 93	118	Vanuatu
Saint Vincent and the Grenadines 119	Venezuela, Bolivarian Republic of		
94 Samoa 95		120	Yemen
Saudi Arabia, Kingdom of 96	Senegal	121	Zambia
122	Zimbabwe		

Source: <https://www.tfadatabase.org/en/groupings/lcds-developing-members>

E. STRUCTURAL ADJUSTMENTS

63. During the Imposition of Safeguard Import Duty (BMTP), the Applicant is obliged to make structural adjustments, based on the provisions of Article 86 paragraph (1) of PP No. 34/2011 and *Article 7.1* WTO AoS.
64. KPPI has held **a coordination meeting** on **July 1, 2025** at the API office, Bandung, West Java with **the Directorate of Textile, Leather and Footwear Industry (ITKAK)** and **the Indonesian Textile Association (API)** in order to discuss the planned structural adjustment program to be carried out by the Applicant.
65. Based on point 64, it is agreed that the structural adjustments to be made by the Applicant are as follows:

Table 15. Applicant's Structural Adjustment Program Plan

No	Plan Program	Activity plan	Unit	Year First	Year Second	Year Third
1	Efficiency Production	a. Optimization of production through production process efficiency;	Index	100	167	233
		b. Optimization of the use of raw fabric materials (<i>grey, finishing, etc.</i>); c.	Index	100	200	250
		Diversification of the addition of types of fabric products (motifs, textures, special <i>finishing</i> , etc.);	Index	100	200	300
2	Productivity Labor	a. Regular training; b.	Index	100	200	300
		Increasing the number of employees participating in productivity improvement and <i>lean manufacturing training</i> ;	Index	100	167	267
3	Product Quality	a. Reducing the level of fabric defects (e.g. weaving, color, <i>printing defects</i>);	Index	100	200	300
		b. Quality certification and laboratory testing for fabrics (color, fastness, strength);	Index	100	200	300
4	Change Technology	a. Machine investment to increase productivity (per sector);	Index	100	233	400
		b. Investment in digital technology for fabric quality control and efficiency energy/water use;	Index	100	200	300
5	Post-End Strategy Production	a. Expansion of export & domestic markets for cotton fabrics (new destination countries/regions);	Index	100	200	300
		b. Strengthening <i>branding</i> and <i>digital marketing</i> to increase demand from foreign and domestic buyers ;	Index	100	200	300

Source: Indonesian Textile Association (API)

66. Explanation of the structural adjustment program that will be carried out by

The applicant is as follows:

1) **Production Efficiency**

Production efficiency activities are carried out through optimizing production processes and efficient use of raw materials, as well as product diversification to meet diverse market needs.

a. **Increased production efficiency** by 100 index points in year I, 167

index points in year II, and 233 index points in year III.

b. **Increase in efficiency of raw material usage** by 100 index points in year I, 200 index points in year II, and 250 index points in year III.

c. **Addition of fabric product types** by 100 fabric type index points in year I, 200 fabric type index points in year II, and 300 fabric type index points in year III.

2) Labor Productivity

Labor productivity activities are carried out through periodic training to improve technical skills and managerial skills.

In addition, the Applicant/API will increase the number of employees participating in the training program.

a. **Periodic training** is carried out for 100 points of the class index in year I, 200 points of the class index in year II, and 300 points of the class index in year III.

b. **Increase in the number of employees participating in the training** by 100 index points per person in year I, 167 index points per person in year II, and 267 index points per person in year III.

3) Product Quality

Efforts to improve product quality are carried out by reducing the level of product defects and adding product quality certifications. a. **Reducing the level of defects** by 100 index points in year I,

200 index points in year II, and 300 index points in year III.

b. **Obtain product quality certification** of 100 index points in year I, 200 index points in year II, and 300 index points in year III.

4) Technological Changes

The applicant/API will make technological changes in a way encouraging the use of machines with automation, software, and digitalization technology, as well as making sustainable investments using modern machines and technology. a. **The investment target for machines** per sector is 100 unit

index points in year I, 233 unit index points in year II, and 400 unit index points in year III.

b. **The addition of digital technology** is 100 index points in year I, 200 index points in year II, and 300 index points in year III.

5) Post-Production Strategy

The post-production strategy that the Applicant/API will implement includes expanding the domestic and international market targets and intensifying digital marketing to reach new customers. a. **Expanding the domestic and international market**

targets by 100 index points in year I, 200 index points in year II, and 300 index points in year III.

b. **Strengthening branding and digital marketing**

Branding and digital marketing strengthening were implemented to obtain 100 new customer index points in year I, 200 index points in year II, and 300 index points in year III.

Appendix 1**List of Producers Represented by the Applicant**

No	Company name	Address
1.	PT. Delta Merlin Dunia Tekstil	Pd. III, Pondok, Grogol District, Sukoharjo Regency, Central Java 57552, Indonesia
2.	PT. Dunia Setia Sandang Asli Tekstil	Jl. H. Fachrudin No. 36, RT.9/RW.5, Petamburan, Tanah Abang District, Central Jakarta City, Special Region Capital City of Jakarta 10250
3.	PT. Damaitecx	Jl. Simongan No. 100, Ngemplak Simongan, West Semarang District, Semarang City, Central Java 50148
4.	PT. Sri Rejeki Isman	Jl. KH. Samanhudi 88, Jetis, Sukoharjo, Solo – Central Java, Indonesia
5.	PT. Sari Warna Asli	Jl. HOS Cokroaminoto no. 28 Pucang Sawit, Surakarta, Central Java. Indonesia 57125
6.	PT. Djohartex	Jl. Raya Magelang - Purworejo, Km 9, Magelang Regency
7.	PT. Senang Kharisma	Solo - Sragen Road No.KM 7,8, Silamat, Karanganyar Regency
8.	PT. Kosoema Nanda Putra	Jl. Karangdowo KM. 3, Jatimulyo, Pedan, Klaten 57468
9.	PT. Agung Sejahtera Sidoraharjatex	Jl. Raya Palur Sragen KM.9, Jaten, Karanganyar Regency, Central Java

Source: Applicant, processed

Appendix 2

Description of 25 (Twenty Five) 8-Digit HS No. Recommended by BMTP

NO	NO. HS	ITEM DESCRIPTION	DESCRIPTION OF GOODS
	52.08	Woven fabric of cotton, containing 85% or more cotton by weight, weighing not more than 200 g/m2.	Woven fabrics of cotton, containing 85 % or more by weight of cotton, weighing not more than 200 g/m2.
		- Bleached: - -	- Bleached:
1	5208.21.00	Plain weave, weighing not more than 100 g/m2	- - Plain weave, weighing not more than 100 g/m2
2	5208.22.00	- - Plain weave, weighing more than 100 g/m2	- - Plain weave, weighing more than 100 g/m2
		- Dyed: - -	- Dyed:
	5208.31	Plain weave, weighing not more than 100 g/m2 :	- - Plain weave, weighing not more than 100 g/m2:
3	5208.31.90 - - -	Others	- - - Other
4	5208.33.00	- - 3-thread or 4-thread twill yarn, including cross twill	- - 3-thread or 4-thread twill, including cross twill
		- Printed: - -	- Printed:
	5208.51	Plain weave, weighing not more than 100 g/m2 :	- - Plain weave, weighing not more than 100 g/m2:
5	5208.51.10	- - - Printed using the traditional batik process	- - - Printed by the traditional batik process
	5208.52	- - Plain weave, weighing more than 100 g/m2 :	- - Plain weave, weighing more than 100 g/m2:
6	5208.52.10	- - - Printed using the traditional batik process	- - - Printed by the traditional batik process
	52.09	Woven fabric of cotton, containing 85% or more cotton by weight, weighing more than 200 g/m2.	Woven fabrics of cotton, containing 85 % or more by weight of cotton, weighing more than 200 g/m2.
		- Unbleached: 5209.11 -	- Unbleached:
		- Plain weave: 5209.11.90 - - - Others -	- - Plain weave:
7	Bleached: 5209.21.00 - - Plain	weave - Dyed:	- - - Other
8	5209.31.00 - - Plain weave		- - Plain weave
9			- Dyed:
			- - Plain weave
		- From multi-colored yarn: 5209.49.00	- Of yarns of different colors:
10	- - Other fabrics	- Printed: - - Plain weave: - - -	- - Other fabrics
			- Printed:
	5209.51	Printed with the	- - Plain weave:
11	5209.51.10	traditional batik process	- - - Printed by the traditional batik process
	5209.59	- - Other fabrics: - -	- - Other fabrics:
12	5209.59.10	- Printed using the traditional batik process	- - - Printed by the traditional batik process
	52.10	Woven fabric made of cotton,	Woven fabrics of cotton,

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NO	HS NO.	DESCRIPTION OF THE	DESCRIPTION OF GOODS
		GOODS containing less than 85 % by weight of cotton, mixed mainly or solely with man-made fibers, weighing not more than 200 g/m2.	<i>containing less than 85 % by weight of cotton, mixed mainly or solely with man-made fibers, weighing not more than 200 g/m2.</i>
		- Bleached:	- <i>Bleached:</i>
13	5210.21.00	- - Plain weave - Dyed: - - 3-	- - Plain weave
		thread or	- <i>Dyed:</i>
14	5210.32.00	4-thread twill yarn, including cross twill	- - 3-thread or 4-thread twill, including cross twill
		- Printed: -	- <i>Printed:</i>
	5210.51	- Plain weave: - - -	- - <i>Plain weave:</i>
15	5210.51.10	Printed using the traditional batik process	- - - Printed by the traditional batik process
	5210.59	- - Other fabrics: - -	- - <i>Other fabrics:</i>
16	5210.59.10	- Printed using the traditional batik process	- - - Printed by the traditional batik process
17	5210.59.90	- - - Others 52.11	- - - Other
		Woven fabrics of cotton, containing less than or equal to 5% cotton than 85% by weight, mixed mainly or solely with man-made fibers, weighing more than 200 g/m2.	<i>Woven fabrics of cotton, containing less than 85 % by weight of cotton, mixed mainly or solely with man-made fibers, weighing more than 200 g/m2.</i>
		- Dyed:	- <i>Dyed:</i>
18	5211.31.00	- - Plain weave - Printed: - -	- - Plain weave
		Other	- <i>Printed:</i>
	5211.59	fabrics: - - - Printed	- - <i>Other fabrics:</i>
19	5211.59.10	with traditional batik process	- - - Printed by the traditional batik process
20	5211.59.90	- - - Others 52.12 Other	- - - Other
		woven fabrics of cotton.	<i>Other woven fabrics of cotton.</i>
		- Weighing no more than 200 g/m2 :	- <i>Weighing not more than 200 g/m2:</i>
	5212.15	- - Printed: - -	- - <i>Printed:</i>
21	5212.15.10	- Printed with the process traditional batik	- - - Printed by the traditional batik process
22	5212.15.90	- - - Others	- - - Other
		- Weighing more than 200 g/m2 :	- <i>Weighing more than 200 g/m2:</i>
23	5212.21.00	- - Unbleached 5212.23.00 - -	- - Unbleached
24	5212.25	- - Dyed 5212.25 - - Printed: - - -	- - Dyed
		Printed with traditional batik process	- - <i>Printed:</i>
25	5212.25.10	process	- - - Printed by the traditional batik process

Source: Indonesian Customs Tariff Book (BTKI) 2022

DOCUMENTATION

A. Public Hearing (Hearing)



B. Verification Visit



NO SECRET



C. Coordination Meeting with Technical Ministries/Agencies and Applicants



D. Coordination Meeting with Technical Ministries/Agencies

